

# CANDIDATE RECRUITMENT – PRIVACY NOTICE.

As part of the recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. This notice will make you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the Data Protection Act 2018 (UK GDPR).

## Data Protection Principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about;
- Kept securely.

## What information does the Company collect?

The Company collects, stores, and uses a range of information about you in connection with your application to work with us. This list includes:

- Your name, address, and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience, and employment history;
- Information about your current level of remuneration, including benefits entitlements;
- Whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK;
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

## How is your information collected?

The Company collects this information from the following sources:

- You, the candidate in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or knowledge assessments that are undertaken as part of the interview process.
- Preferred supplier recruitment agencies, from which we collect the following categories of data: Name, mobile number, qualifications.
- Occupational Health Providers that perform pre-employment medical checks including drug and alcohol testing.

The Company will also collect personal data about you from third parties, such as references supplied by former employers, educational establishments, and industry training providers to verify your qualifications. The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

## Why do we process personal data?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Company processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring processing as permitted by the Data Protection Act 2018.

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references. If you fail to provide us with relevant details, we will not be able to take your application further.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

## Automated Decision Making

Recruitment processes are not based solely on automated decision-making.

## Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Other than potentially seeking to verify your qualifications or checking the references you give us; the Company does not anticipate sharing your personal information with any third parties during the recruitment process. In the event that we do share the information with any of the above-mentioned third-party providers and other entities in the group they are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instruction.

The Company will not transfer your data outside the UK unless you are seeking recruitment in one of our internal jurisdictions, where we will apply our UK GDPR standards and also comply with any local regulations concerning data protection.

## How does the Company protect your data?

The Company takes the security of your data seriously. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. Those parties will only process your personal information on our instruction and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## How long does the Company keep your data?

If your application for employment is unsuccessful, we will retain your personal information for a period of 6 months after we have communicated to you our decision. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## Your rights in connection with personal information

As a data subject, by law you have a number of rights. You can:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing it;
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground;
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Request the transfer** of your information to another party.

If you wish to exercise any of these rights, please contact [compliance@twma.com](mailto:compliance@twma.com) who will supply you with the appropriate form to complete in order to request the action to be taken.

## Right to withdraw consent

When you apply for a role, you provided consent to the Company for us to process your personal data for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent please contact [compliance@twma.com](mailto:compliance@twma.com). Once we have received this notification, we will no longer process your application and subject to our retention policy we will dispose of your personal data securely.

## Further Information

If you have any questions about this privacy notice or how we handle your personal information, please request this by emailing [compliance@twma.com](mailto:compliance@twma.com).

You have right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

A handwritten signature in blue ink, appearing to read 'Halle Aslaksen'.

**Halle Aslaksen**  
Chief Executive Officer  
January 2023