

WJ GROUP
RECRUITMENT CANDIDATE PRIVACY POLICY

1. IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy is issued on behalf of the WJ Group so when we mention "WJ", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the WJ Group responsible for processing your data. The information in this privacy policy describes how we will process your information as a candidate applying for employment at WJ. WJ is made up of different legal entities, details of which are set out below: WJ Group Infrastructure, WJ North, WJ South, WJ Southwest, WJ Products, Nolan Roadmarking & JMS. We will let you know which entity will be the controller for your data when you purchase a product or service with us. WJ Group Infrastructure Limited is the controller and responsible for this website.

You can find our general privacy policy here: <https://www.wj.uk/privacy-policy/>. This privacy policy supplements other policies or notices and is not intended to override them.

WJ is committed to respecting your online privacy and recognise your need for appropriate protection and management of any personal data you share with us.

WJ is the controller and responsible for deciding how your personal data is used. This privacy policy makes you aware of how and why your personal data will be used, namely for the purposes of the WJ employment recruitment process, and how long it will usually be retained for. This privacy policy provides you with certain information that we must provide under data protection laws.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

DPO: Rob Allison

Email address: DPO@wj.uk

Telephone number: 01782 381780 ext 141

Address: 7 Brock Way, Knutton, Newcastle-under-Lyme, Staffordshire, ST5 6AZ

Data protection principles

We will comply with Data Protection Legislation law and principles, which means that your Personal 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.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of Personal Data about you:

- The information you have provided to us in your curriculum vitae and cover letter.
- The information you have provided on our application form, including name, title, postal address, telephone number, email address, employment history, qualifications, date of birth, gender and any other data which can be used to personally identify you.
- Any information you provide to us during assessments or interviews.
- Any information you provide in relation to your right to work documentation or identification checks.
- Health information to allow us to make reasonable adjustments to the recruitment process.

Special categories of personal data

We may collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

How is your personal information collected?

We collect Personal Data about candidates from the following sources:

- You, the candidate.
- Recruitment agencies and vendors we have agreed terms in place with.
- Professional networking profiles.
- Online recruitment websites.
- Our employees and others who refer you to us.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- We also need to process your personal information to decide whether to enter into a contract of employment with you.
- Consider whether we need to provide appropriate adjustments during the recruitment process if you disclose your disability status, for example whether adjustments need to be made during a test or interview.

After receiving your CV, cover letter and/or your application form, we will process that information to decide whether you meet the basic requirements to be screened by our in-house hiring team for the role. We may ask you to undertake further assessments in order to determine your suitability. If you undertake further assessments, we will decide whether your application is strong enough to invite you for an interview, which may be by telephone, video call, or in person. If we decide to invite you for an interview, we will use the information you provide to us at the interview and any other information we have received from you throughout the application process to decide whether to offer you the role.

Our lawful basis for processing your personal data

We must have a legal basis for processing your personal data. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. The legal bases we typically rely on are:

1. **Performance of a contract** with you because we need to process your personal data to ascertain whether we are going to offer and subsequently enter a contract of employment with you;
2. **Necessary for our legitimate interests** because it is necessary for us to process your personal data by conducting an assessment of your credentials to determine your suitability for the role we are offering and decide who we want to employ. We may also need to process data from you to respond to and defend against legal claims;
3. **Necessary to comply with a legal obligation** because in some cases we are required to verify that you have a legal right to work in the UK or make reasonable adjustments to comply with employment laws.

We may, in some circumstances, rely on your consent to processing your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Where we rely on your consent, you have the right to withdraw your consent for processing for that purpose at any time and can do so by emailing to careers@wj.uk or contacting the Talent Acquisition Partner.

Where you wish to withdraw your application, you can do so within the Smart Recruiters Candidate Portal by logging in at this [link](#) or by contacting us at careers@wj.uk.

If you fail to provide personal information

If you fail to provide information which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application properly and we may decide not to take your application further.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you one month to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

The application process may involve screening questions that use automated decision-making but no automated decisions will be made regarding sensitive personal information.

The automated decision-making may affect whether you are able to progress with an application for a particular role and therefore could have a significant impact on you. However, we are permitted to use automated decision-making if it is required and necessary for entering into or performing the contract with us. For example, if a role we have advertised requires you to be able to drive, then you may be asked to confirm that you have a valid driving licence. If you do not confirm that you have a valid driving licence, an automated decision may be made which prevents you from proceeding with your application.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the “*How We Use Your Personal Data*” section above.

- Internal Third Parties as set out below.
- External Third Parties as set out below.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

External Third Parties

- Service providers acting as processors based in Australia, United States, European Union and/or Canada who provide IT and system administration services, including the provision of online recruitment software and e-signature software.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.

5. INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Data security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your Personal Data on our instructions 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.

6. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Where you are unsuccessful in your application, we will retain your personal data for a period of 1 year after we have communicated our decision to you. We retain your personal data during this time

so that we can make you aware of any suitable alternative roles that arise during this period. Where you are successful in your application, we retain your personal data thereafter in accordance with our employee privacy policy.

We further retain your personal data 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 applicable laws and regulations.

In some circumstances you can ask us to delete your data: see the “*your legal rights*” section below for further information or you can delete it yourself.

7. YOUR LEGAL RIGHTS

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “Data Subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Data 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 Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
- Object to processing of your Personal Data 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 Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.

You can exercise your legal rights by:

1. Sending an email to careers@wj.uk; or
2. Updating your personal information on your Smart Recruiters Candidate Portal by logging in via this [link](#). Using your email address and the password supplied to you when you applied for employment with us, you can log in and view all the information we hold about you. Once logged-in you will find the ability to amend or delete your information.

Right to withdraw consent

When you applied for this role, you provided consent to us processing 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 us using the contact details above in the section “*Our lawful basis for processing your personal data*”.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 18 July 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Please visit the ICO [website](#) for further information.