

#### Introduction

This Privacy Notice describes what personal information Restore plc and its subsidiaries (including those legal entities listed below) ("**Restore**") collects in regards to job applicants, why its collected, how it is used, the controls data subjects have over their personal information, and the procedures that are in place to protect personal information during the recruitment process.

All these activities are in accordance with the General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 (the "Act").

We take our responsibility for the personal information we collect about you, very seriously. We will always be transparent about how it is handled and allow data subjects full control. It is important that you read and understand this Recruitment Privacy Notice to ensure that you are aware of how and why we are using the information and your rights in this regard.

## Who is responsible for your personal data?

Restore is partnering with Omni Resource Management Solutions (herein called Omni) to provide a dedicated recruitment service for contingent hire recruitment. At the heart of this partnership is a shared Restore Recruitment Team (herein called the Recruitment Team) who will manage, as the main point of contact, candidate recruitment from your initial enquiry through to successful onboarding. Should you wish to exercise any of your rights as a data subject then you should, in the first instance, contact the Recruitment Team who will process the request to resolution (talent@restoreplc.com).

Restore includes the following subsidiary companies:

- Harrow Green Limited;
- Restore Technology Limited;
- Restore Digital Limited;
- Restore Datashred Limited;

#### **The Data Protection Principles**

When using the term 'personal data' or 'personal information' in this Recruitment Privacy Notice, we mean information (including opinions) that relates to you and from which you could be identified, either directly or in combination with other information which we may have in our possession. It does not include data where your personally identifiable data has been removed (anonymous data).



To help you understand how the Recruitment Team will handle your personal information more clearly, below is a summary of the data protection principles which guide how they will use your personal information. These principles provide that personal data should 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 for so long as is necessary for the purposes we have told you about.
- Kept securely.

Restore has put policies and procedures in place to ensure these principles are adopted across both our recruitment processes - as set out in this Privacy Notice – and our wider business.

## Why Do We Collect Your Data?

The data collected during the recruitment process is used to manage your job application to Restore. Throughout this process, we ensure that the Recruitment Team and the host organisations (Restore and Omni), meet their legal and ethical obligations under law, and provide a fair and transparent recruitment process to identify and onboard the best talent. Should you be unsuccessful we also provide a Talent Pool service, notifying you should other opportunities arise. You will be asked to opt into this service at the point of application and you can change your mind at any time by contacting the recruitment team. They can be reached on: <a href="mailto:talent@restoreplc.com">talent@restoreplc.com</a>.

#### What personal information will be collected?

The Recruitment Team takes great care to ensure that the information we hold about you meets legal, statutory and contractual obligations and is held securely. This includes having appropriate procedures and practices in place to ensure your personal information is protected.

The Recruitment Team will collect and process personal information that you provide as part of the application and recruitment process. This may include your:

- Name, address and contact information, including email address and telephone number;
- Details of your qualifications, skills, experience and employment history;
- Information about your current level of remuneration, including benefit entitlements;
- Whether or not you have a disability, which would mean the Recruitment Team,
  Omni or Restore are required to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK;



- Details of your ethnic origin to allow us to monitor our business's equal opportunities practices; and
- Other such documents, as required.

We collect information in the following ways:

- Online application form or CV;
- Over the phone or in person;
- From Recruitment Agencies/ Umbrella companies;
- Obtained through your passport or other identity documents; and
- Other forms of assessment, including online tests.

# **Do We Process Information about Criminal Convictions?**

All roles at Restore will require us to process information about criminal convictions.

Where we process information about criminal convictions and offences, we do so in order to protect individuals and businesses and to comply with the regulatory and legal obligations which our clients may be governed by. The processing will generally be done under the basis of legitimate interests. A legitimate interest assessment has been carried out by the group data protection manager in relation to this processing, and an appropriately anonymised and redacted version is available to view upon request.

#### How we use your personal data

The Recruitment Team takes your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice.

The data you provide as part of the recruitment process will be used to ensure your application is reviewed, interviews scheduled, and decisions recorded in a professional, fair, and transparent manner. Should you be successful your information will be electronically transferred to the candidate onboarding system to ensure your onboarding journey into Restore is smooth and comprehensive.

If you are unsuccessful, your information may be retained so that the Recruitment Team can notify you of new opportunities. This, however, will only ever be done with your explicit consent.

Following an unsuccessful application, personal data provided throughout the recruitment process will be retained for 12 months from the date of the submission of your application and will automatically be deleted when 12 months has elapsed.



If you fail to provide certain information when requested, the Recruitment Team may not be able to provide the recruitment service we would wish to process your application further.

Change of purpose. The Recruitment Team will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. In the unlikely event that there is a legitimate need to use your personal information for an unrelated purpose, the Recruitment Team will notify you and explain the legal basis which allows us to do so.

# What if I decide I do not wish for my personal information to be used?

If at any point you change your mind, you can ask for your application to be withdrawn and for your details to be deleted by contacting the Recruitment Team at talent@restoreplc.com.

# What Are My Legal Rights?

You have legal rights in connection with your personal information. 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 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. If there has been a change to your personal data that you have supplied to us during the course of your recruitment, you should inform us.
- **Request erasure** of your personal information (commonly known as the 'right to be forgotten'). This enables you to ask us to delete or remove personal information in limited circumstances, where:
  - it is no longer needed for the purposes for which it was collected;
  - you have withdrawn your consent (where the data processing was based on consent);
  - following a successful right to object (see Object to processing);
  - it has been processed unlawfully; or
  - to comply with a legal obligation to which Restore is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for a number of reasons, including:

- for compliance with a legal obligation; or
- for the establishment, exercise, or defence of legal claims.



- **Object to processing** of your personal information by us or on our behalf where legitimate interest is the legal basis for processing data, if you believe your fundamental rights and freedoms outweigh the legitimate interest. If you raise an objection, we have an opportunity to demonstrate that legitimate interest overrides your rights and freedoms. You can object at any time to your personal information being processed for direct marketing (including profiling).
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, but only where: (i) its accuracy is contested, to allow us to verify its accuracy; (ii) the processing is unlawful, but you do not want it erased; (iii) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or (iv) you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent;
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.
- Request the transfer of your personal information. You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where: (i) the processing is based on your consent or on the performance of a contract with you; and (ii) the processing is carried out by automated means.
- **Obtain a copy**, or reference to, the personal data safeguards used for transfers outside the European Union. We may redact data transfer agreements to protect commercial terms.
- Withdraw consent to processing where the legal basis for processing is solely justified on the grounds of consent.

If you want to exercise any of the rights above, please submit your requests in writing to the Recruitment Team at talent@restoreplc.com.

You should be aware that we may not always be able to fully address your request. For example, we may not be able to address your request if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.



#### **Do We Share Your Personal Information?**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is another lawful basis for doing so.

The Recruitment Team's (including Omni and Restore) contracted third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow such providers to use your personal data for their own purpose and only permit those providers to process your personal data for specified purposes and in accordance with our instructions. The third-party providers associated to the recruitment service are described blow.

#### Our Service Providers

This includes external third-party service providers such as accountants, auditors, legal advisors and other outside professional advisors; IT systems support and hosting service providers; technical engineers; data storage and cloud providers; internal reporting software providers, recruitment agencies and other similar third-party vendors and outsourced service providers that assist us in carrying out our business activities.

If you are successful and an offer of employment is made, the Recruitment Team will transfer your name, email address, job title and details relating to your new position and benefits package with an onboarding portal that new starters can access before they join Restore. The portal will provide you access to your contract, information about your new team, office location; and start date.

# **Pre-Employment Screening**

Giant Screening Ltd are Restore's background checking partner appointed to run preemployment checks if an employment offer is made by Restore. The Recruitment Team will share the successful candidate's email address with Giant Screening who will invite the candidate to provide information directly to them through their secure portal.

#### International Transfers of Personal Information

Personal information that you supply to us as part of the recruitment process is currently stored and kept inside the European Economic Area. Should you be successful preemployment checks will be required. For roles not requiring higher levels of checks the information you provide our screening Partner Giant will be stored in the EEA but processed by Giant Screening Ltd in India. Details of how this occurs and the appropriate safeguards taken to ensure this transfer is secure are provided at the point at which this becomes relevant via the Giant Screening portal.



Due to the nature of the technologies required, there is a possibility that your personal information may be transferred to other third-party service providers outside the EEA in the future. In such situations, the information transferred will be the minimum amount of data necessary, anonymised where possible and legal contracts will be agreed to ensure those third parties handle your personal information in accordance with this privacy policy and European levels of data protection.

## **Technical and Organisational Measures**

Omni and Restore take your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place.

#### How long will you keep hold of my information?

Whether you are successful or not, the applicant portal will store your information for a period of 12 months. Your record will then be automatically deleted. If you are successful Restore will continue to process your information for the duration of your employment and retain your information in line with their record retention policies in relation to employee personnel files.

Should you provide further consent for us to keep you informed about future roles and information about Restore as an employer, we will keep your contact details for the 12-month period highlighted above. After the initial 12 months, we will contact you and ask if we can keep your data for a further 12 months. Close to the end of that 12-month period, we will contact you and again obtain your permission to retain your data, and contact you about Restore roles for a further 12 months, and so on. If at any point, you withdraw consent you will no longer receive notifications about future roles. You can withdraw your consent to marketing by contacting the Recruitment Team at any time.

#### **Special Category Data**

Owing to the services we offer the Recruitment Team sometimes need to request sensitive personal information from you for the purpose of recruitment and enabling employment. Where we collect sensitive personal data, we will only request the information required for the specified purpose.

# Where Can I Get Further Information?

Please contact the Restore Recruitment Team in the first instance to try and resolve any issues you may have about how we are processing your personal data under this Recruitment Privacy Notice. The Recruitment Team will escalate any data protection issues, including



Subject Access Requests and other exercised right requests to the respective Restore and/or Omin data protection teams.

Restore has appointed a Group Data Protection Officer (DPO) to oversee compliance with data protection laws. If you have any questions about this Recruitment Privacy Notice or how Restore handles your personal information, please address these to:

Group Data Protection Officer <a href="mailto:dpo@restoreplc.com">dpo@restoreplc.com</a>

Restore's registered office is: Restore plc, 8 Beam Reach, Coldharbour Lane, Rainham, Essex RM13 9YB; Registered Company number 05169780. Restore plc is registered on the Information Commissioner's Office Register of Data Controllers under registration number ZA001717.

Omni's registered office is: Charter House, Woodlands Road, Altrincham, Cheshire, WA14 1HF, registered company number 03278470. Omni are registered on the Information Commissioner's Office Register of Data Controllers under registration number Z7378991. Omni's designated Data Protection Lead can be contacted at <a href="mailto:dataprotection@omnirms.com">dataprotection@omnirms.com</a>.

Further details on how your personal information is processed by Omni and how to make a subject access request can be found in Omni's privacy policy.

Should you be successful Restore will share their Colleague Privacy Notice with you during your onboarding.

You also have the right to contact the Information Commissioner's Office (ICO) at any time and lodge a complaint. The ICO will then investigate your complaint accordingly. Please contact them via <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>.

#### **Cookies**

The following policy describes the different types of cookies and similar technologies that may be applied to all appellia.com websites.

# What are cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.



Some parts of the site may use cookies to remember your logged-in status (for logged-in users), and the current state of choices you have previously made. These are necessary for the operation of the site. Other parts of the site may use cookies to help us to understand how people use the website. The table below explains the cookies we use and why.

# How can I change my cookie settings?

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

To opt out of being tracked by Google Analytics across all websites visit <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>

I confirm that I understand how my personal details and other information will be used by The Restore Recruitment Team.

The Restore Recruitment Team would love to contact you about future job opportunities and with information about Restore as an employer by email, SMS or phone. We will always treat your personal contact details with the utmost care and will never sell them on to anyone else for marketing purposes.

I consent to the Restore Recruitment Team contacting me with details of future job opportunities and information about Restore as an employer during the **12-month period** highlighted above.

You can change your mind at any time by contacting the Recruitment Team.