

CliniSupplies: data protection notice for Recruitment

1. INTRODUCTION

- 1.1 CliniSupplies is committed to protecting the privacy of anyone who applies for employment or other engagement with CliniSupplies (*Candidates*).
- 1.2 We set out below information regarding CliniSupplies' collection, analysis, disclosure and other use of Candidates' personal information. If you accept employment with or are otherwise engaged by CliniSupplies we will, of course, collect more information about you and make other uses of your information – this will be explained to you as part of the onboarding process.

2. INFORMATION COLLECTED FROM CANDIDATES

Where do you collect information from?

- 2.1 CliniSupplies collects information about Candidates in the course of the recruitment process. Some of this information is collected directly from you (for example, in forms that you are asked to complete, or in interviews or through the completion of tests). Other information is generated automatically when you use or otherwise interact with CliniSupplies' systems (for example, when you log in to our website); or provided to us by third parties (for example, recruitment agencies, referees, educational institutions and other employees), including by third party service providers or publicly available sources for anti-money-laundering, background checking (including criminal checks where applicable) and similar purposes, and to protect our business and comply with our legal and regulatory obligations.
- 2.2 CliniSupplies may also collect information from third party psychometric test providers, which will be considered by us during the recruitment process; however no decisions in respect of your application will be made by automated means.

What types of information do you collect?

- 2.3 The information we collect about Candidates includes:
 - 2.3.1 basic information about yourself, such as name, contact details and gender, image and information provided to verify your identity;
 - 2.3.2 information regarding your employment and educational history, any role or roles for which you are applying or being considered and your relevant personal interests, attributes and career aspirations and plans;
 - 2.3.3 other information about yourself that you provide in a CV or similar document;
 - 2.3.4 where applicable, any professional registrations; and
 - 2.3.5 where applicable, criminal records checks,
- 2.4 Generally you should assume that, if we ask you for information, we need it for our recruitment purposes. In some cases we may not be able to consider your application if you cannot provide information that we request. There may be occasions where we

need information to comply with a legal obligation, or conversely where provision of information is entirely optional and would not affect your application – we will let you know if this is the case.

3. OUR USE OF YOUR INFORMATION

How do you use the information you collect about me?

- 3.1 We use Candidate information in accordance with applicable law to manage the recruitment process and assess you for employment or other engagement, to monitor and improve our recruitment processes and for related purposes (including equality of opportunity monitoring), compliance with law and regulation, ensuring the security of our business and purposes relating to legal claims made by or against us.

What happens if my application is unsuccessful?

- 3.2 If you are unsuccessful in your application, we may also retain your Candidate information and use it to assess your suitability for future positions and roles within the organisation (see paragraph 6 for further details).

Will you ask for my consent?

- 3.3 We are entitled to use, disclose and otherwise process Candidates' (and former Candidates') information as described in this notice because we need to do so for the purposes set out in paragraph 3. We do not rely on Candidates' consent to collect, use or otherwise process their personal information other than in exceptional circumstances where our processing is genuinely optional – in those circumstances we will ask for your consent on a case-by-case basis, which can be refused or later withdrawn at any time.

4. DISCLOSURE OF CANDIDATE INFORMATION

Who do you disclose my information to?

- 4.1 CliniSupplies may disclose Candidate information, where reasonably necessary for the various purposes set out in paragraph 3, to:
- 4.1.1 recruitment agencies working with us in relation to your potential recruitment;
 - 4.1.2 other service providers processing Candidate information on our behalf in the course of supporting our business and operations (including any third party psychometric test providers);
 - 4.1.3 to any person who takes over our business and assets, or relevant parts of them;
 - 4.1.4 other members of the CliniSupplies group;
 - 4.1.5 third parties to whom CliniSupplies is required to disclose information by law or regulatory requirement (including litigation counterparties); and
 - 4.1.6 competent regulatory and prosecuting authorities.

- 4.2 If you give us names of potential referees, we may disclose the fact that you are applying to work with us to them when we ask them for references.

5. **INTERNATIONAL DATA TRANSFERS**

Will you transfer my information overseas?

The disclosures of Candidate information described in paragraph 4 may in limited circumstances and/or depending on the role which you have applied for involve international transfers, including transfers to countries outside the European Economic Area which do not have data protection laws as strict as those in the UK (including India). In these cases, where we transfer Candidate information to other members of the CliniSupplies group or third party service providers acting on our behalf, we do in accordance with applicable law including on the basis of agreements put in place to protect your information in a form approved for this purpose by the European Commission.

6. **RETENTION AND DELETION**

How long will you retain my information for?

- 6.1 We will generally retain information about you throughout the recruitment process. Some information will be retained after the process ends, either because you are employed or otherwise engaged by us or, if your application is withdrawn or unsuccessful, because we retain information in case you apply to work for us again (or a suitable position within the CliniSupplies group becomes available) or a recruitment-related dispute arises between us. CliniSupplies will delete or restrict/discontinue the processing of personal data when it is no longer needed after the recruitment process ends, in accordance with their own policies and in accordance with applicable law.
- 6.2 As a general principle, we do not retain Candidate information (except in anonymised / statistical form) for longer than we need it, given the purposes for which it is held. This is typically 6 months after the applicable role has been filled.

7. **RIGHTS AND QUESTIONS**

What rights do I have in respect of the information you hold about me?

- 7.1 With limited exceptions, Candidates have legal rights including the right to be given copies of the personal information that we hold about them and to require inaccurate information to be corrected. In some circumstances you can also require us to delete (or stop making active use of) your personal information.

Who do I contact about this notice?

- 7.2 If you wish to exercise any of these rights, would like to see copies of any of the agreements referred to in paragraph 5 or have other questions about our Candidate information processing or related policies, please contact the Compliance Manager at CliniSupplies Limited, Qualitas House, 100 Elmgrove Road, Harrow, HA1 2RW, privacy@clinisupplies.co.uk.

Can I make complaints to the data protection commissioner?

7.3 You also have the right, at any time, to lodge a complaint about our processing of your personal information with your local data protection commissioner. The details for UK data protection Commissioner can be found here: <https://ico.org.uk/global/contact-us/>.