



GREENPOWER DEVELOPMENTS LTD

## APPLICANT PRIVACY NOTICE

### 1. PURPOSE

- 1.1. GreenPower Developments Ltd. is committed to protecting your privacy and the confidentiality of your personal information. This privacy notice explains how we collect, use and protect your personal information.
- 1.2. We reserve the right to update this privacy notice at any time, and we will make the latest version available on our website.

### 2. INTRODUCTION

2.1. Our use of your personal information is governed by this privacy notice. We will treat your personal information as confidential and in accordance with applicable data protection legislation. Your personal information will only be shared with others in accordance with this privacy notice. In this privacy notice we explain:

- [What personal information is.](#)
- [The types of personal information we collect.](#)
- [How we collect your personal information.](#)
- [How we use your personal information.](#)
- [The legal basis for processing your personal information.](#)
- [How we share your personal information.](#)
- [How long we keep your personal information.](#)
- [How we keep your personal information secure.](#)
- [Your rights in relation to your personal information.](#)
- [How to contact us.](#)

### **3. WHAT PERSONAL INFORMATION IS**

- 3.1. Personal information, or personal data, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).
- 3.2. This includes information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you.
- 3.3. Some personal information is classified as special data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justification for collecting, storing and using this type of personal information.
- 3.4. Any references to personal information in this privacy notice includes personal data, and where relevant, special categories of personal data.

### **4. THE TYPES OF PERSONAL INFORMATION WE COLLECT**

- 4.1. To perform our work, we collect personal data from various groups of people, including prospective employees ('applicants'). We will collect, store and use the following categories of personal information about you:
  - Contact details such as title, current and previous names, telephone numbers, email address, home address.
  - CV or application form, cover letter and shortlisting and interview records.
  - Details of your qualifications, skills, experience and employment history.
  - Information about your current level of remuneration, including benefit entitlements.
  - Information about your entitlement to work in the UK.
  - Information about your entitlement to drive in the UK, where necessary for your applied role.
  - Referee details including their contact information, and your relationship to them.
- 4.2. We may also collect, store and use the following more sensitive types of personal information:
  - Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions (which would not be considered in the recruitment process).

- Information about your health, where there is a genuine occupational requirement in order to establish whether you can perform an intrinsic part of the job (subject to any reasonable adjustments), make reasonable adjustments that may be needed at interview stage, or to take positive action to recruit disabled persons.
- Information about criminal convictions, offences and credit checks, where necessary for your applied role.

## **5. HOW WE COLLECT YOUR PERSONAL INFORMATION**

5.1. We collect personal information about applicants through the application and recruitment process, either directly from candidates or from a recruitment agency. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies, as well as publicly available sources, including professional social media such as LinkedIn.

## **6. HOW WE USE YOUR PERSONAL INFORMATION**

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

- Assess your skills, qualifications, and suitability for the work or role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes and managing our relationship with you.
- Meet any legal, regulatory and/or governance obligations, including for health and safety reasons.
- Ensure compliance with our policies including that our information systems and offices are secure.
- Defend against any legal claims.

## **7. THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

7.1. Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. Generally, we rely on the following legal bases to use your information:

- Where the processing is necessary for us to carry out activities for which it is in GreenPower's legitimate interests (or those of a third party) to do so (such as

recruitment) and provided that your interests and fundamental rights do not override those interests. This includes processing your personal information in ways that you would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for this processing;

- Where we need to comply with a legal obligation (such as under a court order);
- Where we have sought your explicit consent;
- To carry out processing necessary for the performance of a contract.

7.2. The lawful basis for processing the personal data of applicants as described in this document is generally because we have a legitimate interest in processing this data during the recruitment process and for keeping records of said process.

7.3. We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. We use criminal conviction data in the following ways:

- To assess your suitability for employment in the available post.

7.4. You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application.

## **8. HOW WE SHARE YOUR PERSONAL INFORMATION**

8.1. Depending on the reason for processing your personal data, it may be shared with other organisations. We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

8.2. Some examples of whom we might share your information with are:

- Line managers, our Finance Department, and other internal functions as appropriate.
- Employment advisors.
- Other third-party contractors who provide services to us.

8.3. We would only share this information if it was in your best interests or is a required to fulfil your contract, comply with a statutory function, or comply with a legal obligation.

8.4. We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority).

## **9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

- 9.1. Retention periods will vary depending on the type of information we hold on you.
- 9.2. If you do not take up employment with us (due to being unsuccessful or refusing an offer), your application, CV, Cover Letter, any shortlisting and interview records, and any supporting documents that you may have submitted as part of your application will be held for one year before being deleted.
- 9.3. If you are successful in obtaining paid employment with us, we will hold your information in accordance with our Employee Privacy Notice which will be provided to you at the relevant time.

## **10. HOW WE KEEP YOUR PERSONAL INFORMATION SECURE**

- 10.1. The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access, use, alteration, destruction, and loss of your personal information.
- 10.2. Electronic (and sometimes physical) records may be held for each applicant. Data is held securely on GreenPower systems and at our premises.
- 10.3. Access to your personal information is limited to:
  - HR Manager, who oversees recruitment and personnel matters; and
  - Directors, who bear personal liability for company actions, ensuring compliance and accountability at the highest level.

## **11. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION**

- 11.1. Under certain circumstances, by law you have the right to:
  - Ask us to remove your personal data from our records (though this will not apply where it is necessary for us to continue to use the data for a lawful reason, to fulfil your contract of employment, or for statutory purposes).
  - Have inaccurate data rectified.
  - Request a copy of the information we hold about you (subject to exemptions as dictated by the ICO).
  - Where technically feasible, obtain and reuse your personal data for your own purposes.

## 12. HOW TO CONTACT US

- 12.1. If you have any questions about our privacy policy or information we hold about you, or if you have a complaint about privacy or misuse of data, please contact our HR Manager, Laura Stasyte, using the email [laura@greenpowerinternational.com](mailto:laura@greenpowerinternational.com).
- 12.2. If you would like to find out more about the law and your rights surrounding how people use your personal information you can visit the Information Commissioner's Office webpage at [www.ico.org.uk](http://www.ico.org.uk).

## 13. IMPLEMENTATION AND REVIEW

<b>Privacy Notice reviewed by the Board:</b>	07 May 2024
<b>Privacy Notice implemented:</b>	08 May 2024
<b>Privacy Notice review date:</b>	07 May 2025

