

# Althaus Digital Limited

## Job Applicant Privacy Notice

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### Introduction

Althaus Digital Limited (“Althaus”, “we”, “us”, “our”) are a company registered in England and Wales, registration number 06941675, with our registered office at Charlotte House, Stanier Way, The Wyvern Business Park, Derby, England, DE21 6BF. We are the Controller of the Personal Data we process, registered in the UK with the Information Commissioner’s Office (“ICO”), registration number ZA120763.

We are committed to protecting your privacy and meeting our legal obligations when you apply for a job or you (or an agent acting on your behalf) share your employment details with us.

This privacy notice explains what Personal Data we collect and use relating to employment and the associated candidates (“you”, “your”) during the recruitment process.

We place great importance on ensuring the quality, confidentiality, integrity, and availability of the data we hold, and in meeting our data protection obligations. We are committed to protecting the security of your Personal Data. We use a variety of technical and organisational measures to help protect your Personal Data from unauthorised access, use or disclosure.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the date at the top of this document.

### What Personal Data do we process?

Personal Data means any information about an individual from which that person can be identified, therefore does not include data where the identity of the person has been removed (anonymous data). There are also special categories of more sensitive Personal Data which require a higher level of protection.

When you apply for a position, whether as an employee, worker, consultant, contractor or intern, or submit your CV (or similar employment information), whether directly or through an agency, or attend an interview in person or by remote means, we will collect your Personal Data.

This includes (but is not limited to):

- Name and contact details (address, mobile phone number and email address);
- Company details (where applicable);
- Date of birth and gender;
- Curriculum Vitae;
- Work history and employment positions held;
- Salary, other compensation, and benefits information;

- Nationality / visa / right to work information (where applicable);
- Academic and professional qualifications, education, and skills;
- Photographs you may submit with your application;
- Demographic information;
- Records we create during interviews or correspondence with you;
- Results of pre-employment screening checks such as references or Disclosure and Barring Service (“DBS”) checks (where applicable); and
- Any other information you choose to give us.

We may also collect special category data in accordance with the Equality Act 2010 and other equality laws. We will only do this to make reasonable adjustments to enable all candidates to apply for vacancies, attend interviews and to commence employment. This is also necessary to ensure we meet our legal obligations when recruiting.

As part of our recruitment process for roles involving regulated activity or where individuals will have access to children or vulnerable adults, we carry out DBS checks. This processing is necessary to fulfil our safeguarding obligations and is carried out for reasons of substantial public interest under the Data Protection Act 2018, Schedule 1, Part 2, Paragraph 18 (Safeguarding of children and individuals at risk). Please see our [Safer Recruitment Policy](#) for more information.

## How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email.

However, we may also collect your Personal Data from third parties, such as referees and recruitment agencies. Where you provide referee contact details of referees, we will notify those individuals that their Personal Data is being processed for the purposes of carrying out reference checks in connection with your application.

## Purposes and bases for using your Personal Data

We will process your personal information for the following purposes and under the following lawful bases:

Purpose	Lawful Basis for Processing
To respond to your employment enquiry.	We have a legitimate interest to contact you regarding your application, to arrange an interview and to inform you of your progress through the recruitment process.
To assess your suitability for the role.	Processing is necessary for taking steps to enter into a contract with you or for the performance of our contract with you.  For special category data, the additional basis that we rely on relates to our obligations in the

	field of employment and the safeguarding of your fundamental rights.
To make reasonable adjustments for you during the interview process and comply with our legal obligations under the Equality Act 2010.	<p>Processing is necessary for us to comply with our legal obligations.</p> <p>For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights.</p>
Obtaining necessary references from third-parties and conduct pre-employment screening checks including checking your identity and your right to work in the UK (where required),	<p>Processing is necessary for us to comply with our legal obligations.</p> <p>For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights.</p>
To contact unsuccessful applicants about future suitable vacancies.	We will carry out this processing where you have consented to us retaining your data and contacting you about future vacancies based on the skills set out in the records we hold about you (Article 6(1)(a) of the UK GDPR). You can withdraw your consent at any time.
CCTV image capture to ensure the health, safety and security of employees and visitors	Processing is necessary in our legitimate interest to protect the health, safety and security of employees and visitors.

## Sensitive Personal Data

We will only process sensitive special category Personal Data where we meet one of the conditions required by law for doing so. This includes complying with legal obligations or exercising specific rights in the field of employment law. We may also ask for your explicit consent to process some special categories of Personal Data, but this is rare.

We process special categories of Personal Data when we collect or process information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work and to provide appropriate workplace adjustments.

## Sharing of your information

We may share your Personal Data with service providers and suppliers to our business who process data on our behalf. In such cases, our service providers and suppliers are Processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the written contract between Althaus and the service providers and suppliers.

Within Althaus, your Personal Data will only be shared with those who need to have access to it, which will primarily be our HR function, hiring managers and IT staff.

## International Transfers

Your Personal Data will not be processed outside the UK. However, should a business need dictate and we process your Personal Data outside the UK, we will take appropriate steps to ensure the Personal Data has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation); or
- we enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf \(ico.org.uk\)](#)).

## How long will we retain your information?

We will retain your Personal Data for only as long as is necessary for the recruitment process. If your candidacy is successful and you are employed or hired by us, your data will be processed and retained as set out in our employee privacy notice, provided to you with your employment paperwork.

If your candidacy is not successful, we will retain your CV, application details and interview notes for 6 months from the date we notified you we would not move forward with your application, to inform you about any future vacancies we have that may be of interest to you. Please let us know if you would like us to delete your records before our retention period lapses and we will do so.

We will also retain Personal Data where it is necessary to comply with our legal obligations or as necessary in relation to legal claims. This is rare but may mean we need to retain your data for longer than 6 months.

## Your rights

There are certain fundamental rights that you have in respect of your Personal Data:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their Personal Data
Right of access	Individuals have the right to receive a copy of their Personal Data, and other supplementary information
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete
Right to erasure	Individuals have the right to request their personal information to be erased, in certain circumstances
Right to restrict processing	Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular: <ul style="list-style-type: none"> <li>• if your data is not accurate;</li> <li>• if your data has been used unlawfully but you do not want us to delete it;</li> <li>• if your data is no longer needed, but you want us to keep it for use in legal claims; or</li> <li>• if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request</li> </ul>
Right to data portability	Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances
Right to object	Individuals have the right to object to the processing of their Personal Data, in certain circumstances  Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way  Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so
Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

In addition to the above, an individual also has the following right:

Rights	Description
Right to withdraw consent	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time

Rights	Description
Right to lodge a complaint with the ICO	You have the right to raise a complaint about how we handle your personal information with the ICO.

## **How to exercise your rights**

If you wish to exercise any of your rights, please contact [dataprotection@althausdigital.co.uk](mailto:dataprotection@althausdigital.co.uk).

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

As mentioned above, data subjects in the UK have the right to lodge a complaint with the ICO if you believe we are infringing UK data protection laws. You have the right to make a complaint at any time to the Information Commissioner's Office if you are concerned about the way in which we are handling your Personal Data.

## **Contact**

You can contact us in relation to data protection and this privacy notice by emailing the Data Protection Manager at [dataprotection@althausdigital.co.uk](mailto:dataprotection@althausdigital.co.uk).

## **Data Protection Officer**

We do not have a statutory requirement to appoint a Data Protection Officer ("DPO") under the UK GDPR. However, for the purposes of compliance and accountability, we have appointed [Evalian Limited](#), a company specialising in data protection, cyber security and information security, as our DPO. Evalian Limited can be reached at [dpo@evalian.co.uk](mailto:dpo@evalian.co.uk).