

# **PRIVACY NOTICE** **RECRUITMENT**

## **ABOUT US**

Terumo Aortic is the trading name of Vascutek Limited (Registered Number: SC079773) (“we”, “our”, “us”). We respect your privacy (“you”) and we recognise the need for appropriate protections and management of your personal information.

When we, and our service providers, collect and use your personal information we are the data controller for the purpose of Data Protection Legislation (defined below).

## **PURPOSE OF THIS PRIVACY NOTICE**

We have prepared this Privacy Notice to assist you in understanding what information we collect about you when you apply for a job with us and how that information is used by us and by third parties as part of the recruitment process.

If you are successful and we offer you a position, we will provide you with a further privacy notice to explain how we use your personal data during your employment with us.

## **KEY TERMS**

**Criminal convictions data** means data relating to the alleged commission of offences; or proceedings for an offence committed or alleged to have been committed or the disposal of such proceedings, including sentencing.

When we refer to **Data Protection Legislation** we mean the General Data Protection Regulation (Regulation (EU) 2016/679) (**GDPR**); and any legislation implemented by the UK to give effect to the derogations permitted under the GDPR.

**Personal information** is information that can be used to identify or contact a specific individual, such as a name, address, telephone number, email address, etc., and also online identifiers and location data such as IP addresses and mobile device IDs.

**Special category data** means personal information revealing your racial or ethnic origin; political opinions; religious or philosophical beliefs; or trade union membership; genetic data; biometric data; data related to your health or data concerning your sex life or sexual orientation; and criminal convictions or involvement in criminal proceedings.

A **data controller** is someone who decides why personal data is to be collected and how it will be used and treated.

Our Online Recruitment Solution means careers.terumo-aortic.com as provided by Firefish (company number SC370891).

## **CONTACT US**

If you have any questions regarding the Privacy Notice you can contact us at: careersuk@terumo-aortic.com or Newmains Avenue, Inchinnan, Renfrewshire PA4 9RR, Scotland UK.

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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **CHANGES TO THIS PRIVACY NOTICE**

We may update this notice at any time but if we do so, we will provide you with an updated copy of this Privacy Notice as soon as reasonably practical.

## **COLLECTING YOUR PERSONAL INFORMATION**

We collect personal information about candidates from the following sources:

- You, the candidate when you contact us through our Online Recruitment Solution or when you correspond with us by email, phone or letter.
- Through recruitment agencies or advertising platforms (such as Indeed) who will pass your details to us.
- Your named referees.
- The Disclosure and Barring Service and Disclosure Scotland in respect of criminal convictions data.

**HOW DO WE USE YOUR PERSONAL INFORMATION AND WHY?**

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Condition	Effect of Not Providing the Information	Retention Period(s)
Your name and contact details (e.g. telephone numbers, postal address, email address)	To contact you in relation to your application.	It is in our legitimate interests to have the ability to contact you in relation to your application.	N/A	If you fail to provide this information we will not be able to process your application successfully.	6 months after we have communicated to you our decision about whether to appoint you to the role.
	To send you job alerts by email if you sign-up to this.	With your prior consent only.  You can set preferences as to the location and type of job you are interested in hearing about.  You can unsubscribe from these alerts at any time (please see the section outlining your rights below).	N/A	N/A	For as long as you would like to continue to receive these alerts.
	We may use your e-mail or telephone number to advise you of similar alternative or new vacancies if you have given us permission to do so.	With your prior consent only.	N/A	N/A	For as long as you would like us to hold your CV or application, whichever is earlier.
	To notify you of any changes to this privacy notice.	We are required by law to inform you if we will change the way we use your data.	N/A	N/A	N/A
The information you have provided to us in your CV and covering letter	If you are applying for a specific role or you are enquiring through our Online Recruitment Solution we will use your CV to assess your skills, qualifications, and suitability for the role.	We process this on the basis of our legitimate interests of understanding and assessing your experience and qualifications.	We ask that you do not provide us with special category data or details of criminal convictions within your CV and covering letter.	If you fail to provide this information we will not be able to process your application successfully.	We do not accept speculative CVs by email or post and we will delete or shred these immediately upon receipt.  Otherwise, 6 months after we have communicated to you our decision about whether to appoint you to the role.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Condition	Effect of Not Providing the Information	Retention Period(s)
If you sign up for our job alerts you will be asked to provide a note of the location(s) and sector(s) where you are seeking a job.	So that we can ensure that our job alerts are specific and related to your preferences.	With your prior consent only.  You can unsubscribe from these alerts at any time (please see the section outlining your rights below).	N/A	N/A	For as long as you would like to continue to receive these alerts.
All candidates will be asked at interview stage to provide documentary evidence of their right to live and work in the UK (copy of passport or birth certificate).	We are required to undergo these checks by law.	This is a legal obligation placed on us to ensure compliance with the Immigration, Asylum and Nationality Act 2006	This may reveal information in relation to your race or ethnic origin and is therefore special category data.  We will process this special category data on the basis that it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us in connection with employment.	If you fail to provide information when requested, which is necessary for us to consider your application we will not be able to process your application successfully.	If you are unsuccessful, 6 months after we have communicated to you our decision.  If you are successful, we will retain this for the duration of your employment with us and 6 years after.
If you are successful and make it to interview we may take notes during the interview.	To document the interview and to allow us to assess your skills, qualifications, and suitability for the role.	We process this on the basis of our legitimate interests of understanding and assessing your experience and qualifications.	N/A	If we cannot collect this information then we may not be able to process your application successfully.	6 months after we have communicated to you our decision about whether to appoint you to the role.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Condition	Effect of Not Providing the Information	Retention Period(s)
We may collect information in relation to your health	We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.	We are legally required to do this in accordance with the equalities legislation.	This is special category data as it is in relation to your health.  We will process this special category data on the basis that it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us in connection with employment.	N/A	6 months after we have communicated to you our decision about whether to appoint you to the role.
Bank account details	If in exceptional circumstances, we agree to pay your travel expenses for attending an interview then we may require a note of your bank account details.  It is not our standard policy to pay travel expenses.	Our legitimate interests in paying you for your travel.	N/A	If you do not provide this information then we cannot repay you for your expenses.	Up to 7 years (in line with HMRC) or >7 years if another legal requirement applies
If we decide to offer you the role we will then take references.	To verify your skills and experience for the role.	This is necessary for the employment contract.	N/A	If you fail to provide us with relevant details, we will not be able to take your application further.	If your references are unsatisfactory, 6 months after we have communicated to you our decision.  If you are successful, we will retain this for the duration of your employment with us and 6 years after.

Information	Why We Collect It	Legal Basis	Special Category Data Condition / Criminal Conviction Condition	Effect of Not Providing the Information	Retention Period(s)
If we would like to offer you the role, we may collect information about your criminal convictions history if relevant to the role.	The nature of our business requires that, from time to time, our employees have access to areas that must comply with aviation security and consequently we need to be made aware of any unspent criminal convictions whether acquired prior to or during employment.	We are required by law to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.	The processing is necessary for the purposes of carrying out our legal rights and obligations in connection with the employment relationship.	If you fail to provide us with relevant details, we will not be able to take your application further.	If you are successful, we will retain this for the duration of your employment with us and 6 years after.
If we would like to offer you the role, you may be required to complete a medical questionnaire if relevant to the role.	This helps us ascertain that you are fit to undertake your contractual role whilst ensuring that we provide adequate support in terms of health and safety provision.	This is necessary for the employment contract.	The processing is necessary for the purposes of carrying out our legal rights and obligations in connection with the employment relationship.	If you fail to provide us with relevant details, we will not be able to take your application further.	If the information you provide within your medical questionnaire is unsatisfactory, 6 months after we have communicated to you our decision.  If you are successful, we will retain this for the duration of your employment with us and 6 years after.
If you attend our premises for an interview then you may be recorded by the CCTV cameras outside our office and you will be asked to complete our visitors book.	This is for fire and safety regulation purposes and for the detection and prevention of crime.	We are legally required to ensure the safety of our visitors.  We used CCTV on the basis of our legitimate interests e.g. to prevent and detect crime.	N/A	We cannot allow you to enter the premises.	Minimum of 28 days before data can be overwritten.

### **DO WE SHARE PERSONAL INFORMATION?**

We contract with third party service providers and suppliers to deliver certain services. Our 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 our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

The following third parties may have access to your personal information for the purposes noted below:

- the party that provides us with our online recruitment solution, who is currently Firefish (company number SC370891 );
- Microsoft currently hosts our email on Office 365;

- Integral Occupational Health Limited and Accura Occupational Health Limited currently provide us with occupational health services and may have access to your health data for these purposes;
- If you connect to our guest WiFi when you attend our premises for an interview, Cisco Meraki are our current providers;
- we are part of a group structure, and your personal information may require to be transferred to one or more of our group companies;
- the Disclosure and Barring Service and Disclosure Scotland in respect of criminal convictions data;
- any other person who is authorised to act on your behalf;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant dispute resolution body or the courts; and
- persons or organisations in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in our business.

Our service providers change from time to time and we will inform you if this is the case. We will not sell, trade or lease your personal information to others.

### **WHERE DO WE STORE YOUR INFORMATION**

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to correspond with you.

We also may transfer data outside the UK or the EEA where our, service providers host, process, or store data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the European Commission or is otherwise made in circumstances where we have put appropriate safeguards in place to protect your data in accordance with the Data Protection Law.

### **YOUR RIGHTS**

- Request access to your personal data (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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You can exercise your rights by contacting us at [careersuk@terumoaortic.com](mailto:careersuk@terumoaortic.com).

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 clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Further details about your rights can be found on the ICO's website at <https://ico.org.uk/>.

### **OUR ONLINE RECRUITMENT SOLUTION**

If you use our Online Recruitment Solution this additional section also applies to you.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information for our internal purposes. This is statistical data about our users' browsing actions and patterns.

We may also obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Cookies 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. You may delete and block all cookies from this site, but parts of the site will not work.

You block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our site.

Further information on the Firefish Cookie policy can be found at; <https://www.firefishsoftware.com/privacy-cookie-policy>.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Online Recruitment Solution, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.