

## **Job Applicant Data Protection Notice**

**For job applicants of Gordian Holdings Limited ("Gordian")**

### ***Gordian's commitment to your privacy***

Gordian Holdings Limited is committed to protecting and respecting your privacy rights. This protection notice ("**Notice**") tells you about the use that Gordian will make of the personal information we hold about you, how we will collect certain personal information, under what circumstances we may share or otherwise use the information and who we may disclose it to.

### ***What personal data do we collect about you?***

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses, place and date of birth.
- Gender, marital /family status.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter (to include qualification information/test results where required) as part of the application process, interview information.
- Employment records (including job titles, work history, skills information, professional memberships, qualifications and performance information).
- Information on your current level of remuneration including benefits entitlements.
- Investigatory, disciplinary and grievance information.
- Information on termination of employment/freelancing relationship.

We may also collect, store and use the following "special categories" of more **sensitive personal information**:

- Information about your health, including any medical conditions and health and sickness records.
- Information about criminal convictions and offences, where relevant to your role.

### ***How is your personal information collected?***

We collect personal information about employees, workers and freelancers through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We may also view publicly available sources and public information on social media such as LinkedIn.

We will continue to collect additional personal information in the course of job-related activities throughout the period of you working for us as described above.

### ***Why do we ask for this information?***

All of the information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for. We will also retain your name and CV on file for future vacancies, unless you ask us not to.

***What is the legal basis for processing your data?***

We hold and process the categories of information in the list above to allow us to process your application for employment with Gordian, we may also retain for information for the time period indicated in order to consider you for future opportunities that arise, subject to your consent. The situations in which we will process your personal information are listed below:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the applicable jurisdiction.
- Assessing qualifications/skills for the particular job.
- Ascertaining your fitness to work.
- Complying with health and safety obligations.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide certain information when requested, we may not be able to proceed with your application.

We 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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We will use your **sensitive personal information** in the following ways:

- We will use 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, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We may also collect data relating to criminal convictions and offences, as part of the assessment performed, in line with internal policies.

***What will we do with the information you provide to us?***

As required by data protection legislation, Gordian has security procedures regarding the storage and disclosure of personal data. In the course of your application process, Gordian may engage third parties such as background screening companies and payroll providers. Gordian may disclose your personal data to these third parties in connection with your application. We will share your personal information with such third parties where required by law, where it is necessary to administer your application or where we have another legitimate interest in doing so. For a full list of specific providers, please contact Gordian Human Resources.

At all times, Gordian will ensure that the personal data is processed in accordance with our instructions and in circumstances which require the recipient to observe industry standard security measures in respect of personal data. Gordian may also be under a duty to disclose or share your personal data in order to comply with a legal or regulatory obligation, where such disclosure is required by a court of competent jurisdiction. Gordian will not disclose or transfer personal data about you to third parties for the purposes of marketing.

The personal data that we collect about you may be transferred to, and stored at, one or more countries outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for Gordian or for our third parties. In such cases, Gordian will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under the EU General Data Protection Regulation and as described in this Notice. If Gordian cannot ensure such an adequate level of data protection, your personal data will only be transferred outside the EEA if you have given your prior consent to such transfer.

***How long is the information retained for?***

If you are successful in your application to join Gordian Holdings, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment, plus any additional length of time as recommended by law or regulation depending on the type of information, following the end of your employment.

If you are unsuccessful at any stage of the process, based upon the consent provided as part of your application, we will retain your data for the duration required to process your application, generally not more than 6 months from the date of receipt. If consent was provided to maintain your data for future job vacancies, we will keep the last for 2 years from the date of receipt. At the end of the 2-year period, we will delete or destroy your data, unless you have decided already to withdraw your consent to our processing of your data.

***Job Applicants’ Rights under the EU General Data Protection Regulation***

As a job applicant you have the right to access personal data we hold about you, and to request rectification or erasure of such personal data, or restriction of processing concerning the data subject, or to object to processing as well as the right to data transfer/portability. You may address your requests to Gordian's Data Protection Officer [dataprotection@gordianholdings.com](mailto:dataprotection@gordianholdings.com) or the HR department via [careers@gordianholdings.com](mailto:careers@gordianholdings.com)

***Changes to this Notice***

Gordian reserves the right to change this Data Protection Notice and any other relevant policies or procedures at any time without notice to you. Any changes we may make to this Notice in the future, will be posted on Gordian's website [www.gordianholdings.com](http://www.gordianholdings.com). Any changes Gordian may make to this Notice (which will, unless otherwise indicated, apply to any personal data already obtained by Gordian before the changes were made) will be effective from the date on which those changes have been posted on this website. Where appropriate, Gordian may also notify you of any changes made by e-mail.

***Complaints or queries***

For the purposes of the data protection legislation, Gordian is the data controller. If you have any questions on this notice, please contact our HR Department at [careers@gordianholdings.com](mailto:careers@gordianholdings.com)

***Raise a complaint***

Where you are dissatisfied with any aspect of our handling of your personal data, you have a right to lodge a complaint at the Office of the Commissioner for Personal Data Protection. You may contact the Office of the Commissioner for Personal Data by visiting <http://www.dataprotection.gov.cy>