



# CANDIDATE PRIVACY NOTICE



DEVRO

## 1. AIM OF NOTICE

We are committed to protecting the privacy and security of candidates' personal information. For the purposes of applicable data protection legislation, the relevant national Devro entity which you are engaged with is the "data controller" detailed in [Appendix 1](#).

This privacy notice describes how we collect and use personal information about you during and after the recruitment process.

Throughout this privacy notice, we use a number of defined terms – a full list of these along with a definition of each can be found at [Appendix 2](#).

## 2. PRINCIPLES

We will protect the security and privacy of your data, which means it will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Stored securely.

## 3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae (CV) and covering letter;
- The information you have provided on any application form or recruitment documents, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, or contact details for referees;
- Information that is publicly available through social media sites such as, but not limited to, LinkedIn;
- Any information you provide to us during an interview;



- Written test exercise work and test results;
- Video recordings such as those that may be submitted as part of the recruitment process (in response to specific screening questions);
- Photographs, if included on CVs or otherwise on supplementary document submitted as part of the recruitment process;
- The results of any personality profiling assessment that we may carry out as part of the recruitment process; and
- Your bank account details to reimburse you if you have claimed expenses associated with the recruitment process.

We may also collect, store and use the following types of sensitive personal information (sometimes referred to as special category data) regarding;

- Your race or ethnicity, religious beliefs, and sexual orientation;
- Your health, including any medical condition, health and sickness records;
- Data on relevant criminal convictions and offences.

#### **4. HOW YOUR PERSONAL INFORMATION IS COLLECTED**

We collect personal information about candidates from the following sources:

- You, the candidate.
- A recruitment agency, from which we collect the same categories of data detailed in the section above.
- Information that is publicly available through social media sites such as, but not limited to LinkedIn.
- Your named referees, from whom we collect data to verify your employment history, absence history, character or work performance.

#### **5. HOW WE WILL USE YOUR INFORMATION**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

Please see [Appendix 4](#) for more information on how we use your personal information and the legal basis we rely on to do so.

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

We will use your sensitive (or special category) personal information in the following ways:

Information	Use
<b>Disability Status</b>	to consider whether we need to provide appropriate adjustments during the recruitment process, for example, whether adjustments need to be made during a test or interview process
<b>Race, nationality, ethnic origin, religious, philosophical or moral beliefs, your sexual life or sexual orientation</b>	to ensure meaningful equal opportunity monitoring and reporting
<b>Criminal Convictions</b>	We do not envisage that we will typically seek information about criminal convictions. Where the role requires, we are entitled to carry out a criminal record check in order to satisfy ourselves that there is nothing which makes you unsuitable for the role. We will comply with the required data protection legislation with regards this data.

## 7. FAILURE TO PROVIDE PERSONAL INFORMATION

You are under no statutory obligation to provide data during the recruitment process however we require this information on the basis of our contractual obligation to decide whether we wish to enter into an employment contract with you. If you do not provide the information, we may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work, evidence of qualifications and satisfactory references.

## 8. AUTOMATED DECISION-MAKING

We do not generally make any recruitment decisions based solely on automated decision-making. In the event that we do ever use automated decision-making that could have a significant impact on you, we will let you know in advance.

## 9. DATA SHARING

We will only share your personal information with the following third parties for the purposes of processing your application:

- a recruitment agency;
- other Devro companies within our group; or
- our third-party service providers.

### 9.1 THIRD PARTY PROVIDERS

We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions and all relevant privacy laws.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies and we have in place

data processing agreements with such third party service providers to protect your personal information where they are conducting processing operations on behalf of Devro.

## 9.2 CROSS BORDERS

Your personal information may be processed in the countries where you have applied for a job, or any other country where we have operations (for group transfers we have an intra-group data sharing and processing agreement in place which incorporates the Standard Contractual Clauses (“SCC’s”) as an adequacy measure and the countries to which we transfer intra-group are outlined in [Appendix 3](#)). Third-party organisations processing personal information for us must comply with all relevant privacy laws in order to protect your personal information in any country where they process or transfer the data.

## 10. DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable authorities of a suspected breach where we are required to do so.

## 11. DATA RETENTION

If you are unsuccessful in your application, we will retain your personal information for a period of twelve (12) months after we have communicated to you our decision not to appoint you to the role. After this period, we will securely destroy your personal information in accordance with, our Data Retention Policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

If you are successful in your application, we will retain your personal information in accordance with our Employee Privacy Notice.

## 12. ACCESS, CORRECTION, ERASURE, AND RESTRICTION OF DATA

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to

object to processing.

- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Withdraw Consent** where we have relied on consent as a legal basis for processing, you have the right to withdraw your consent for processing for that purpose at any time.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party or withdraw consent, please contact our Data Protection Support Team.

### 13. DATA PROTECTION SUPPORT TEAM

We have a Data Protection Support Team to oversee data protection compliance. The team comprises of;

- Company Secretary and/or Group Legal Counsel;
- Global HR Business Partner; and
- Group IT Manager.

If you have any questions about this document or how we handle your personal information, please contact the Data Protection Support Team on [dpst@devro.com](mailto:dpst@devro.com).

### 14. COMPLAINT

If you believe that a breach of your privacy has occurred, we encourage you to contact the Data Protection Support Team using the contact details in section 13 above to discuss your concerns.

Your complaint will be considered and dealt with by our nominated representative, who may escalate the complaint internally within Devro if the matter is serious or if necessary to resolve it.

Depending on the data protection law applicable to you, you may have the right to make a complaint at any time to the relevant supervisory authority for data protection issues. Details of the relevant authorities can be found in [Appendix 3](#).

## Appendix 1 – Devro Entities

Location	Entity
<b>Australia and New Zealand</b>	Devro Pty Limited (No. ACN 050 095 755) Registered Address: 139 Sydney Road, Kelso, NSW, 2795, Australia
<b>China</b>	Devro (Nantong) Technology Co., Limited (913 206 910 850 779 46T) Registered Address: No 329, Xinxing East Road, Nantong Economic and Technological Development Area, Nantong, Jiangsu, People's Republic of China
<b>Czech Republic</b>	Devro s.r.o. (No, C19560) Registered Address: Víchovská 830, 514 19 Jilemnice, Czech Republic
<b>Hong Kong</b>	Devro Asia Limited Devro Asia Limited Registered Address: 7/F C K K, Commercial Centre, Wanchai, 289 Hennessey Road, Hong Kong
<b>Japan</b>	Devro KK (No: 0100-01-051259) Registered Address: Yasuda Shibaura Building, No 2, 3-2-12, Kaigan Minato-ku, Tokyo, 108-0022 Japan
<b>Netherlands</b>	Devro B.V. (No. 10041845) Registered Address: Willem Alexanderstraat 9, 6691 EE Gendt, Netherlands
<b>United Kingdom</b>	Devro plc (No. SC129785) Registered Address: Moodiesburn, Chryston, Scotland, G69 0JE or Devro (Scotland) Limited (No. SC129787) Registered Address: Moodiesburn, Chryston, Scotland G69 0JE
<b>USA</b>	Devro, Inc (State ID Number: 0763710) Registered Address: Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808, US

## Appendix 2 – Glossary of Terms

<b>Term</b>	<b>Definition</b>
<b>Data Controller</b>	the person or organisation that determines when, why and how to Process Personal information
<b>Data Retention Policy</b>	explains how we classify and manage the retention and disposal of information. Time periods for retention are set out in the retention schedule attached to the Data Retention Policy.
<b>Data Subject</b>	a living, identified or identifiable individual about whom we hold Personal information. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal information.
<b>Personal Information</b>	any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably possess. Personal Information includes Special Categories of Personal Information.
<b>Privacy Notice</b>	a separate notice setting out information that may be provided to Data Subjects when the organisation collects information about them.
<b>Processing or Process</b>	any activity that involves the use of Personal information. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal information to third parties.
<b>Sensitive Data or Special Categories of Personal Information</b>	information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

### Appendix 3 – Data Protection Authorities

<b>Country</b>	<b>Data Protection Authorities</b>	<b>Contact</b>
<b>Australia</b>	Office of the Australian Information Commissioner	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>
<b>China</b>	China Ministry of Industry and Information Technology	<a href="http://www.miit.gov.cn">www.miit.gov.cn</a>
<b>Czech Republic</b>	Czech office for personal data protection (Úřad pro ochranu osobních údajů)	<a href="http://www.uoou.cz">www.uoou.cz</a>
<b>Hong Kong</b>	Office of the Privacy Commissioner for Personal Information, Hong Kong	<a href="http://www.pcpd.org.hk">www.pcpd.org.hk</a>
<b>Ireland</b>	The Data Protection Commission	<a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a>
<b>Japan</b>	Japanese Ministry of Public Management, Home Affairs, Posts and Telecommunication	<a href="http://www.soumu.go.jp/english/index.html">www.soumu.go.jp/english/index.html</a>
<b>New Zealand</b>	The Office of the Privacy Commissioner, New Zealand	<a href="http://www.privacy.org.nz">www.privacy.org.nz</a>
<b>Netherlands</b>	Dutch Data Protection Authority (Autoriteit Persoonsgegevens)	<a href="http://www.autoriteitpersoonsgegevens.nl">www.autoriteitpersoonsgegevens.nl</a>
<b>Russia</b>	Roscomnadzor	<a href="http://www.rsoc.ru/">http://www.rsoc.ru/</a>
<b>UK</b>	The Information Commissioner's Office ("ICO")	<a href="http://www.ico.gov.uk">www.ico.gov.uk</a>
<b>USA</b>	Federal Trade Commission	<a href="http://www.ftc.gov/">http://www.ftc.gov/</a>



## Appendix 4 – How we use personal information

Information	Purpose	Why we collect it	Special Category Data Condition / Criminal Conviction Data Condition
Name and Contact Details (Address, Telephone Number, Email Address) and data of birth	To contact you in relation to your application.	Devro's legitimate interest in contacting you about the role you have applied for.  Necessary for taking steps to enter into a potential employment contract.	N/A
CV / Application Letter	To ensure suitability for role.	Necessary for taking steps to enter into a potential employment contract.	N/A
Employment History	To ensure suitability for role.	Necessary for taking steps to enter into a potential employment contract.	N/A
Education Background and details of Qualifications	To ensure suitability for role.	Necessary for taking steps to enter into a potential employment contract.	N/A
Notes from Interviews	To ensure suitability for role.	Necessary for taking steps to enter into a potential employment contract.	N/A
References/ Work Performance Assessments (where applicable)	To ensure suitability for role.	Necessary for taking steps to enter into a potential employment contract.	N/A
Health Information	To ensure your health and safety in the workplace and to assess your fitness to work. We will only carry these out when relevant to your role.	Legal obligation.  Necessary for taking steps to enter into a potential employment contract.	Necessary for the purposes of carrying out the obligations and exercising our rights or your rights in the field of employment.

Criminal Convictions Information	<p>Required as staff may work at locations where criminal convictions checks are required by law. We will generally only collect information about criminal convictions if it is appropriate given the nature of the role (and where we are legally able to do so).</p> <p>Sometimes our customers and clients require that these checks are implemented due to the nature and location of the work.</p>	<p>Legal obligation.</p> <p>Necessary for taking steps to enter into a potential employment contract.</p>	<p>Necessary for the purposes of carrying out the obligations and exercising our rights or your rights in the field of employment.</p>
Equal Opportunities information (including race, ethnic original, sexual orientation)	We will use information to ensure meaningful equal opportunity monitoring and reporting.	Legal obligation.	Necessary for reasons of substantial public interest.