Candidate Privacy Notice

1. Introduction

- 1.1 This Privacy Notice explains how Stratagem IPM Limited (the "Company") handles and uses information it collects about job applicants. This notice is non-contractual and can be amended at any time.
- 1.2 The Company is a "data controller". The Company's address is Meridian Court, Comberton Road, Toft, Cambridge, CB23 2RY. The Chief Executive Officer has overall responsibility for monitoring compliance with data protection.

2. On what basis does the Company process your information?

- 2.1 The Company will use your personal information in the following circumstances:
 - (a) Where it needs to take steps prior to entering into an employment contract with you (*).
 - (b) Where it needs to comply with a legal obligation (**).
 - (c) Where it is necessary for the Company's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (***). The legitimate interests of the Company are to recruit the best candidate for any vacancy and it believes that this is not incompatible with your rights and freedoms.
- 2.2 We have indicated by asterisks in section 3 below the purpose or purposes for which the Company processes your personal information. There may be several grounds which justify the Company's use of your personal information.
- 2.3 The Company may process 'special categories' of sensitive information in the following circumstances:
 - (a) where it is necessary to comply with employment law; and
 - (b) in limited circumstances, with your explicit written consent.

3. What personal information about you is processed by the Company?

- 3.1 The Company processes personal information, including:
 - (a) Name, title, address, marital status and contact details (* and **);
 - (b) Evidence of right to work in the UK (**);
 - (c) Information relating to age and gender (*);
 - (d) Application form, CV and/or cover letter, education/job history, interview notes, references, pre-employment assessment, proof of qualifications (*and**); and

(e) Any correspondence relating to the outcome of the recruitment process (either successful or unsuccessful) (*and**).

4. How is your information used by the Company?

- 4.1 The Company will use your personal information in the following ways (this list is not exhaustive):
 - (a) Ensuring that you have the right to work for the Company;
 - (b) Making a decision about your recruitment or appointment;
 - (c) Managing the recruitment process;
 - (d) Monitoring equality and diversity within the Company;
 - (e) Making decisions on recruitment strategy looking at external candidate market trends;
 - (f) To obtain legal advice; and
 - (g) Ensuring compliance with legal requirements.
- 4.2 The Company collects personal information about applicants either directly from candidates or sometimes from an employment agency. We may sometimes collect additional information from publicly available sources, such as social media sites (e.g. LinkedIn).

5. What happens if you fail to provide personal information?

5.1 Where the provision of your personal data is required for the Company to enter into an employment contract with you, or is a statutory requirement, refusal to provide this personal information will prevent the Company from being able to offer you employment.

6. Will you be subject to automated decision making?

6.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless the Company has a lawful basis for doing so and it has notified you.

7. Who will your personal information be disclosed to?

- 7.1 Your personal information will be accessed by authorised staff who need to have access to that information (i.e. the recruiting manager and HR Manager).
- 7.2 No personal information will be transferred to a third party located outside of the UK unless we are certain that an adequate level of protection exists.

8. How long will the Company use your information for?

8.1 The Company will only retain your personal information for as long as necessary to fulfil the purposes it collected the personal information including for the purposes of satisfying any

legal, accounting, or reporting requirements. For further information on the timescales for retention, please see the Company's Retention Policy in the Staff Handbook.

9. What are your rights relating to your personal information?

- 9.1 Under certain circumstances, by law you have the right to:
 - (a) Request access to your personal information (commonly known as a "data subject access request").
 - (b) Request correction of the personal information that the Company holds about you.
 - (c) Request the erasure of your personal information.
 - (d) Request the restriction of and objection to processing of your personal information.
 - (e) Request the transfer of your personal information to a third party.
- 9.2 Some of these rights are not automatic, and the Company reserves the right to discuss with you why it might not comply with a request.
- 9.3 In addition, in the limited circumstances where you may have provided your consent to the processing of your personal information, you have the right to withdraw your consent at any time. To withdraw your consent or exercise any of the above rights, please contact the Chief Executive Officer.

10. Who can you contact if you have concerns about the Company's use of your personal information?

- 10.1 If you have any concerns or queries about the Company's use of your personal data, please contact the Chief Executive Officer.
- 10.2 You retain the right to lodge a complaint about the Company's management of your personal data with the Information Commissioner's Office.