



GDPR Privacy Notice for Candidates

Purpose

Aquascot Ltd ('Aquascot' 'we' 'us') is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all Aquascot's candidates ('you'), where you are applying for work with us, whether as a partner or contractor.

Aquascot is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former candidates, and it makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. This notice does not form part of any contract including a contract to provide services, and we may update this notice at any time.

It is important that you read this notice, together with any other privacy information and/or notices we may provide to you on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We have appointed a Data Privacy Manager who is responsible for overseeing any privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Privacy Manager using the details set out below.

Full name of legal entity: Aquascot Limited

Data Privacy Manager: Stacey McFarlane

Email address: privacy@aquascot.com

Postal address: Unit 14 Fyrish Way, Teaninich Industrial Estate, Alness, IV17 0PJ

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us in the first instance if you have a complaint so that we can try to resolve it for you.

Data protection principles

We shall comply with data protection law, most notably the General Data Protection Regulations (GDPR). This says that the personal information we hold about you must be:

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



The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you as follows:

- The information you have provided to us in your CV (curriculum vitae) and cover letter.
- The information you have provided to us during the application process, including on our application form, or through any online job portal/website or recruitment agency. This may include: your name, title, address, telephone number, personal email address, gender, employment history, qualifications, skills and experience, and national insurance number.
- Any information you provide to us during the interview process, including during the interview itself, any psychometric tests, aptitude tests, work sample tests.
- Any information provided to us about you through the collection of an employment reference from the referees provided to us.

There are “special categories” of more sensitive personal data which require a higher level of protection.

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates 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, recruitment agencies, DVLA or other background check agencies.

How we will use information about you

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

- Assess your skills, qualifications, and suitability for the work or 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.

It is in our legitimate interests to decide whether to appoint you to a role as it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and/or cover letter or your application form and the results from any recruitment tests, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to invite you for an interview, we will use the information you provide to us during the interview process to decide whether to offer you the role. If we decide to offer you the role, we will then seek references and carry out any criminal record and/or any other checks required before confirming your appointment.



If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

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

- 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 a test, interview, or any other part of the interview process.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Change of purpose

We shall 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 shall notify you and we shall explain the legal basis which allows us to do so.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

Information about criminal convictions

We envisage that we will process information about criminal convictions.

We may collect information about your criminal convictions history if we would like to offer you a role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled 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. In particular if we are legally required to carry out criminal record checks for those carrying out a particular type of work or where the role requires a high degree of trust and integrity.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in our group. We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We will only share your personal information with third parties for the purposes of processing your application. At the date of this privacy notice, this may include Brook Street, s1 Jobs, Indeed, or other third party recruitment agency.



How secure is my information with third-party service providers, and other entities within the group?

All our third-party service providers and other entities in our group are required to take appropriate security measures to protect your personal information in line with our company 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.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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 partners, 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. Details of these measures may be obtained from the Data Privacy Manager.

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

Data retention

How long will you use my information for?

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

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 notify you separately, seeking your explicit consent in writing to retain your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

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

- Request access to your personal information (commonly known as a “data subject access request”). 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 (see below).



- 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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the company's Data Privacy Manager in writing.

No fee usually required

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

What we may need from you

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 another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the company's Data Privacy Manager.

Once we have received notification that you have withdrawn your consent, we will no longer process your application, unless we have another legitimate basis for doing so in law, and we will dispose of your personal data securely. Any use of your personal information before you withdraw consent remains valid.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and a digital copy of this privacy notice is available on our website. If you have any questions about this privacy notice, please contact our Data Privacy Manager by email to privacy@aquascot.com in the first instance.