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| Form No. | HR-POL-42 |  | Last Review | April 2021 |
| Revision | 2021 - 01 | | Reviewed By | J. Hulme |

Marlowe Recruitment Privacy Notice Policy

Thank you for your interest in applying for a position at Marlowe Fire & Security Group. Before you provide us with your CV, application form or personal information, we want to tell you about what we will do with the personal information you give us throughout the application and recruitment process.

This Privacy Notice explains what personal information we will collect and hold about you and how we will use that information about you during the application and recruitment process. We may collect personal information about you which does not relate to the application and recruitment process from time to time. When we do, this Privacy Notice may not apply. Please ensure that you read and understand all privacy notices which we provide to you.

We ask you not to provide us with your personal information (or allow anyone else to pass your personal data on to us on your behalf) until you have read this Privacy Notice and are happy that you understand it. If you are providing a CV, application form or other information about, or on behalf of, another person, you must make sure that you tell them what you are providing to us and have their consent to do so. You must also make them aware of this Privacy Notice before passing any personal information on to us. If you have already provided us with personal information and you no longer wish for us to process your personal information, please contact recruitment@marlowefireandsecurity.com and we'll do what we can to assist you.

We want you to be well-informed about how we and why we collect your personal information and how it is used throughout the recruitment process. So, please feel free to ask us questions, raise concerns or exercise your rights (these are detailed further down) at any time. We try to continuously improve our recruitment process, so we may update this Privacy Notice from time to time. It is important that you check the website for updates to the Privacy Notice from time to time.

1. Who we are

Given that this is our recruitment privacy policy, we know you're likely to know a little about us, however, just in case, we are Marlowe Fire & Security Group, our head office is based at Lowry House, 5 Ohio Avenue, Salford Quays, Greater Manchester, M50 2GT. Marlow Fire & Security Group consists of 8 established and complimentary brands: Marlowe Fire & Security, BBC Fire and Security, FAFS Fire and Security, Marlowe Kitchen and Fire Suppressants (formerly flamefast) Island Fire

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Protection, FSE Fire and Security, Morgan Fire Protection and Hadrian Technology. We are a controller of the personal information provided to us during the application and recruitment process, which means that we determine how and why personal information is processed.

In this Privacy Notice when we say “Marlowe Fire & Security”, “we”, “us” or “our”, we are referring to “Marlowe Fire & Security Group”.

2. What personal information do we collect?

At Marlowe Fire & Security, we love to identify the best talent and encourage people to apply for jobs with us. To enable us to run a smooth and impartial recruitment process, we need to process personal information about all potential candidates. We limit the collection and processing of information necessary to achieve one or more purpose as identified in this notice. The personal information which we collect about you may include:

- Contact information such as: name, title, addresses, telephone numbers, and personal email addresses,
- Copies of driving license, passport, birth certificate, proof of change of name and proof of current address, such as bank statements and council tax bills;
- Evidence of how applicants meet the requirements of the position, including academic certificates, references, CV's and information contained within application forms.
- Evidence that applicants are entitled to work in the location of the vacancy.
- Records of correspondence with applicants regarding the position or the recruitment process.
- The status of a person's application.
- Notes about a person's answers to questions during the interview stages (including at telephone interviews).
- Personal information relating to pre-employment checks which may include criminal record, credit, and directorship checks, depending on the role applied for.
- Salary details from previous employers and salary expectations (including benefits and bonuses).
- Personal information which is required in relation to a specific job or role.
- Health data, where this is required for us to be able to implement special measures for individuals with a disability; and

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- If you are successful, we may gather additional information such as bank details and next of kin.

Special Category Personal Information

Some of the information which we ask you to provide may be 'special category information'. Special category information simply means personal information which relates to your gender, racial or ethnic origin, religious or philosophical beliefs, trade union membership, physical or mental health condition and/or sexual orientation. We ask you not to provide any special category information to us unless we specifically ask you to. Please be aware that we may not be able to process special category information even when it has been provided inadvertently. We may simply delete all documents containing special category information where we have no lawful basis to hold it.

3. How we collect personal information

Usually, we collect personal information directly from you in circumstances where you wish to apply for a position with us, whether this is online, through emails to us, at a recruitment fair, or otherwise. However, there are occasions where we may learn about you through third parties such as recruitment agencies, where an employee recommends you, or from other sources such as LinkedIn. If you are successful, we may also collect information about you from previous employers and/or academic institutions which you have attended. This Privacy Notice applies in respect of all recruitment activity whether you have provided personal information directly to us or it has been provided to us through a third party.

4. Why we collect personal information

We collect your personal information for the following specified purposes:

- To consider your application for a job;
- To contact you about your job application;
- To move your application forward;
- To send you notifications about your progress and/or other vacancies which are relevant to you.
- For statistical business reporting purposes

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5. Our lawful basis

A controller may only process personal information where there is a lawful basis allowing them to do so. When we process personal information during the recruitment process, generally, we will rely on the following lawful basis’:

- **Contract:** where processing personal information is necessary to move applications forward before signing a contract of employment.
- **Legal obligation:** where processing personal information is required by law. For example, when we are required by law to perform checks about your right to work in the location of the vacancy or to ensure reasonable adjustments are made for disabled applicants or employees.
- **Legitimate interest:** where it is in the legitimate interests of Marlowe Fire & Security (or a relevant third party), to process personal information. For example: in order to decide whether to offer employment, to make decisions about salary and benefits, to assess training needs, to defend legal claims against us and to send you notifications about your progress and other vacancies which are relevant to you; and
- **Consent:** in certain circumstances, such as when we process special category information about you, we may be required to seek your consent. Where we do ask for your consent, we will tell you the reasons for the processing, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. Please be aware that we do not always require your consent to use special category information, in some cases we are required by law to process special category information, or will need to process it in order to exercise specific rights under employment law; in other cases, we will be permitted to use such information where you have already made the data public. If you would like more information about this, please do not hesitate to contact us.

We want to ensure that the personal information which we collect, and the processing of it, is proportionate. We will notify you of any changes to the personal information we collect, or the purposes for which we collect and process it by updating this Privacy Notice. It is important that you check the website for updates to this Privacy Notice from time to time.

6. Who we share your information with

We will share personal information with Marlowe Fire & Security employees who have responsibility for recruitment, such as members of our Resourcing Team, the wider HR Team, and other parties

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directly involved in the recruitment process, for example the Hiring Managers. Other members of staff may have access to personal information where such access is required for the due performance of their function. For example, members of the IT department may have sight of your personal information while resolving an issue for a Marlowe Fire & Security employee. Employees who access personal information are aware of their obligations to only process personal information in accordance with the UK Data Protection Act 2018 and, where applicable, the GDPR.

Where you have applied through a recruitment agency, we may share personal information with them. Please ensure that you read the privacy notice of any recruitment agencies before permitting them to pass your personal information to us.

Where you are successful, we may share personal information with third parties to obtain references and to perform pre-employment checks. If you are employed with us, you will be required to sign an employment contract which may contain additional details about how your personal information will be handled and stored once, you are an employee.

Please note that pre-employment screening and references are conducted prior to a conditional offer of employment being made.

Depending on the role applied for, we may conduct criminal record, credit, and directorship checks. We will only carry out such pre-employment checks where we have a legal requirement to do so, where such checks are generally accepted principles of good practice and where such checks are directly relevant to the position applied for. We may share your contact details with our pre-employment screening provider, who will contact you to arrange for the relevant checks to be conducted in accordance with our written instructions.

We use an Applicant Tracking System to manage our online job postings and applications. Natural HR (www.NaturalHR.com) processes and hosts your CV and/or application forms (which contain personal information about you) on behalf of Marlowe Fire & Security, as a processor. When NaturalHR acts as a processor, it will collect and process your personal information in the manner and for the purpose determined by Marlowe Fire & Security.

Please be aware that when you access the Natural HR website, Natural HR may collect personal information directly from you (including through the use of cookies) for its own purposes. Where Natural HR does collect personal information directly from you, it does so as a controller. Natural HR sets out how and why it collects and processes personal information about you on its website (via its Privacy Policy and Cookies Policy). Such processing is separate from the processing activities which

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Natural HR carries out for us. When Natural HR acts as a controller, it is responsible for its own compliance with data protection laws.

7. Where personal information is stored

Personal Information may be held at our offices and those of our group companies. It may also be held at the offices of third-party agencies, cloud providers, service providers, representatives, and agents. Where personal information is stored or transferred outside of the EEA or the UK, we will ensure that appropriate measures are in place to ensure its adequate protection. A full list of Marlowe Fire & Security group companies can be found on our website. Where Marlowe Fire & Security transfers or stores your personal information outside the UK and/or the EU, we will put appropriate measures in place to ensure that any personal information transferred is subject to adequate legal protections through a mechanism approved by the European Commission and/or the UK Government, as applicable.

8. How your personal information is kept secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

9. How long we keep your personal information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful, the nature of the information concerned and the purposes for which it is processed.

If your application is not successful, we will keep your personal information for 6 months from the date on which we were last in contact with you. This is to ensure that, where possible, we can re-engage with you should alternative suitable roles arise and to assist us to resolve any issues or queries about the recruitment process which may arise. Unless you are successful, all personal information which is

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held about you will be deleted or destroyed, at the end of the 6 months and no record of your application will be held by us after then. For the avoidance of doubt, this includes any digital records held in our Applicant Tracking System, as well as all locally held personal information, in either soft or hardcopy form. We may delete your personal data before the 6 months has ended if you have exercised your right to object to the processing and we have no other lawful basis to continue the processing.

If your application is successful, your personal information will be transferred to our HR administration department either in hard copy, email, or our HR software NaturalHR and processing will be subject to your employment contract and employment privacy notice.

10. Your rights

The law on data protection gives you certain rights in relation to the personal information which we hold about you. These are:

- **The right to be informed.** This means that we must tell you how and why we use your personal information. The purpose of this Privacy Notice is to keep you informed.
- **The right of access.** You have the right to access the personal information that we hold on you. To do so, you should make a subject access request. You normally will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, if a request is clearly unfounded, repetitive, or excessive, we may charge a reasonable fee. Alternatively, in certain circumstances, we may refuse to comply with your request.
- **The right for any inaccuracies to be corrected.** If any personal information that we hold about you is incomplete or inaccurate, you can require us to correct it. We may ask for confirmation from you that the updated information you provide is accurate and correct. It is important that the personal information we hold about you is accurate and current. Please keep us informed of any changes to your personal information which we hold about you.
- **The right to have information deleted.** If you would like us to stop processing your personal information, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it. Please be aware that we may not be required to delete personal information, for example where we are required to keep the information by law. When we do not agree to delete your personal information, we will tell you as soon as possible after the deletion request is made.
- **The right to restrict the processing of the personal information.** This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if

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you want us to establish its accuracy; (b) where our use of the personal information is unlawful but you do not want us to erase it; (c) where you need us to hold the personal information 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 personal data but we need to verify whether we have overriding legitimate grounds to use it.

- **The right to portability.** You may transfer the personal information that we hold on you for your own purposes. Where we have relied upon consent as a legal basis, we may be required to provide you with your personal information in an easily transferable format.
- **The right to object to the inclusion of any information.** You have the right to object to our processing of your personal information where we are relying on a legitimate interest (or the legitimate interest of a third party) and there is something about your situation which makes you want to object to processing. An objection could be because you feel the processing impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. Where we send you updates or notifications about your progress or vacancies which may interest you, you may opt out of such notifications at any time by contacting your Marlowe Fire & Security contact or our Data Protection Officer.
- **The right to regulate any automated decision-making and profiling of personal information.** You have a right not to be subject to automated decision making that adversely affects your legal rights.
- Where you have provided consent to enable our use of your personal information, you also have the unrestricted **right to withdraw** that consent at any time. Withdrawing your consent means that we will stop processing the personal information that you had previously given us consent to use. There will be no consequences for withdrawing your consent.

11. Further information

We may need to request specific information from you to help us confirm your identity or verify your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

12. How you can contact us and your right to complain.

If you have any questions about this Privacy Notice for Recruitment or data protection or privacy matters generally, please contact our Data Protection Officer.

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If you would like to exercise any of your rights as set out in part 10 of this Privacy Notice, please contact the Resourcing team (recruitment@Marlowefireandsecurity.com) or Marlowe Fire & Security'

Data Protection Officer:

The contact details for the Data Protection Officer are:

The Data Protection Officer
Marlowe Fire & Security Learning and Development Limited
Lowry House,
5 Ohio Avenue
Salford Quays
Greater Manchester
M50 2GT
Tel: 0330 0102000
E-mail: dpo@marlowefireandsecurity.com

Whilst we hope that you will not need to, if you do wish to complain about how we handle personal information, you may contact our Data Protection Officer as above. Where you are unsatisfied with the response of the Data Protection Officer or are unable to get your issue resolved, please be aware that you also have the right to complain to the relevant data protection Supervisory Authority. The UK Information Commissioner's Office (ICO) is the relevant Supervisory Authority for Marlowe Fire & Security. We would appreciate the chance to deal with your concerns before you approach the ICO. You can however contact the ICO as follows:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow, Cheshire SK9 5AF

Email: casework@ico.org.uk

Telephone: + 44 303 123 1113

Website: www.ico.org.uk

Status of Privacy Notice and changes

This Privacy Notice is effective from April 2021. We may change it from time to time so please check regularly to keep informed of updates.