

# Privacy Notice for Prospective Employees

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## Purpose of this document

This privacy notice describes what personal data is processed by Twenty7tec regarding job applicants, potential candidates for employment and our optional recruiting programs and events, and selection procedures in view of potential recruitment. It describes the information we collect, what we do with it (the “purpose”) and our lawful reason for processing it (our “legal basis”), with whom we share it, how long we store it and what rights and obligations you as an applicant have.

## Twenty7tec’s information and contact details

Address: Avalon, Suite A, 7th Floor, Bournemouth BH8 8EZ

Email:

Telephone: 01202 553457

Data Protection: [security@Twenty7tec.com](mailto:security@Twenty7tec.com)

## Personal data in the context of the application process

Personal data is information about personal or factual circumstances of a specific or identifiable natural person. This includes information such as your name, address, telephone number, personal identification code and date of birth, but also data about your specific career, etc., which can be assigned to a specific person with reasonable effort. Information that is not (in)directly associated with your real identity, on the other hand, is not personal data.

## Personal data that we collect directly from you

This Privacy Notice covers any candidate data that is collected by Twenty7tec for the recruiting process. This may include but is not limited to the following information:



- △ Your name (first and last name), contact details and candidate status.
- △ Information included in your CV or cover letter, such as employment history, academic background, skills and competencies, personal interests, languages spoken, and questionnaire results.
- △ Job preferences and type of employment sought and willingness to relocate.
- △ Names and contact details of referees. Please note that it is your responsibility to obtain consent from your referees prior to providing us personal information about them.
- △ Current and historic salary details together with salary expectations. Twenty7tec may, subject to your consent, collect data from third parties, in order to conduct employment background check, to the extent this is permitted by the applicable law.
- △ Also notes about the candidate may be created by persons working for Twenty7tec to process, manage candidates and to handle communication through and in-between recruiting activities.

During the recruitment process we might ask you to participate in assessment days, complete tests, or occupational personality profile questionnaires, and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes.

The data collected from you is voluntary and is not based on a statutory or contractual obligation to provide the personal data.

## Personal data we collect from other sources

We may publish job openings on occupational platforms, and we may also find you based on your availability and profile settings in the same. In the event you apply for an opening at Twenty7tec through an application function on an occupational platform or similar online service provider (“Partner”), it is important to note that the relevant Partner may retain your personal data and may also collect data from Twenty7tec in respect of the progress of your application. This includes our recipients of personal data (see below) that may, depending on their features, enrich data by way of analytics and collecting data about a candidate based on publicly available information about you.

We may also receive your personal data from a third party who recommends you, or informs us of your eligibility, as a candidate for a specific opening or for our business more generally.










Candidate assessment days, tests or occupational personality profile questionnaires, attending an interview – or a combination of these will result in personal data generated by you, us and potentially a third in the event that there is third party involvement. Any use by a Partner of your data will be in accordance with the Partner's Privacy Notice and subject to the terms and conditions between you and Partner on one hand, and Twenty7tec and Partner on the other.

## Automated processing

We do not use any automated decision making in recruitment. There is a human intermediary in each processing activity even if we use third party recruitment tools with certain automated features.

## The purposes and legal basis for the processing

Your personal data is processed for the purposes of managing Twenty7tec's recruitment related activities. Consequently, Twenty7tec may use personal data in relation to the evaluation and selection of applicants as needed in the recruitment process. Your data is processed for the following purposes:

-  Identifying potential candidates for open or future positions.
-  Determining your qualifications for employment and reaching a recruitment decision.
-  Evaluating your suitability for other employment vacancies.
-  Verifying the data you submit through referees.
-  Conducting background checks (subject to the applicable national legislation).
-  Informing you, via e-mail, SMS or otherwise about the progress of your application.
-  Protecting our rights and fulfilling our legal obligations.
-  Informing you, via e-mail, SMS or otherwise about other vacancies at Twenty7tec that we consider you suitable to make an application of employment for.
-  Enhance information that Twenty7tec receives from you with information obtained from third party data providers.



Should your application for employment be successful, your personal data submitted for hiring purposes may be processed for the necessary employment purposes and included in your employment file.

If Twenty7tec does not employ you, Twenty7tec may (subject to your freely given consent) nevertheless continue to retain and use your personal data collected during the recruitment process in order to consider you for new positions.

**Legal basis:** Lawful, fair and transparent data processing is at the core of the Twenty7tec recruitment process. Twenty7tec processes the personal data generated throughout the recruitment and communication process on the following basis:

Purpose of use	Legal Basis	Categories of Data
Identifying potential candidates for open or future positions;	Legitimate interest	All
Determining your qualifications for employment and reaching a recruitment decision	Actions necessary prior to entering employment or service contract.	All
Evaluating your suitability for other employment vacancies	Legitimate Interest	All
Verifying the data you submit through referees	Consent	Qualifications
Conducting background checks	Legitimate Interest (further subject to national laws)	All
Informing you, via e-mail, SMS or otherwise about the progress of your application for employment with Twenty7tec.	Actions necessary prior to entering into employment or service contract.	Name, phone number, email
Protecting our rights and fulfilling our legal obligations.	Legitimate interest	Name, notes of your application process

Enhance information that Twenty7tec receives from you with information obtained from third party data providers.	Legitimate interest (further subject to national laws)	All
Informing you, via e-mail, SMS or otherwise about other vacancies at Twenty7tec that we consider you suitable for.	Consent	Name, phone number, email

## Recipients of your personal data

Only selected employees of Twenty7tec, such as the management team, potential future line managers or HR staff, and selected third parties who support us with the recruitment process, have access to your personal data. Except as set out in this policy or as required by law, your personal data will not be supplied to any third party without your explicit authorisation.

## Transfers of your personal data to other countries

Following the submission of your application, the information you have sent to us can be made available to Twenty7tec managers worldwide for the purposes described previously. This transfer is reliant on applicable transfer mechanisms approved under the GDPR and updated by the EU/EEA from time to time.

## The storage period

Your personal data shall not be kept for longer than is necessary for the recruitment process.

Therefore, unsuccessful application data without consent to contact you for other positions, will be deleted after 1 year, taking into consideration our need to



answer queries or resolve problems and comply with legal requirements under the applicable laws.

In addition to using your data for the position for which you have applied, Twenty7tec may retain and use your application data to consider you for other positions, but only with your explicit consent for a maximum period of 3 years. If after this period, we feel it necessary to retain your records, we will destroy all personal data.








If you receive and accept an offer for employment with us as part of the application process, we will store the personal data collected during the application process for at least the duration of the employment relationship.

You can nevertheless always ask Twenty7tec to delete your data by sending your request via e-mail to [security@Twenty7tec.com](mailto:security@Twenty7tec.com)

## Your rights as a data subject

You have the following rights under the GDPR, subject to the applicable statutory limitations:

request access to information that Twenty7tec holds about you:

-  Request a correction of information that Twenty7tec has about you.
-  Request the erasure of information that Twenty7tec has about you.
-  Restrict the use of your personal data.
-  Receive your personal data.
-  Object to the processing of your personal data.
-  Withdraw your consent for the use of your personal data.
-  File a complaint about our processing with a supervisory authority.

GDPR also gives you the right to lodge a complaint with a supervisory authority in the EU/EEA state where you work, normally live or where any alleged infringement of data protection laws may have occurred.

Please contact us on the details above if you have any questions about Twenty7tec's Privacy Policy or its processing of your personal data.