# Contents

1.	Data Controller	1
2.	Data Protection Officer	1
3.	Introduction	2
4.	Scope	2
5.	Related documents	2
6.	What information does the organisation collect?	2
7.	The source of the information collected?	3
8.	How is the information stored?	3
9.	Why does the organisation process personal data?	3
10.	Special category (sensitive) information	4
11.	Who has access to personal data?	4
12.	Transferring personal data outside the European Economic Area (EEA)	4
13.	How does Ultra protect personal data?	4
14.	How long does Ultra keep personal data?	5
15.	Your rights	5
16.	Right to complain	5
17.	What if you do not provide personal data?	6
18.	Automated decision making	6
19.	Document review	6

# 1. Data Controller

Ultra Electronics is the Data Controller for the purposes of data protection law. This means that we are responsible for deciding how we hold and use your personal data.

# 2. Data Protection Officer

The Group Data Protection Officer is part of the General Counsel and Company Secretary team within Head Office. The Group Data Protection Officer is responsible for informing and advising us about our data protection law obligations and monitoring our compliance with these obligations (dpo@ultra-electronics.com).

# 3. Introduction

As part of any recruitment process, Ultra Electronics and subsidiary companies (hereafter referred to as 'Ultra') collects and processes personal data relating to job applicants. Ultra is committed to being transparent about how it collects and uses that personal data and to meeting its personal data protection obligations.

# 4. Scope

This Privacy Notice applies to all prospective applicants / candidates during the recruitment and selection process when applying for a role with Ultra. The application could be for a permanent, temporary or fixed term contract of employment as well as applications from candidates applying for an Apprenticeship or to provide services via a Limited Company supplier agreement or through an Employment Agency or Umbrella Company.

# 5. Related documents

The Ultra data privacy notice can be accessed via this site:

https://www.ultra.group/policies-and-legal-notices/

# 6. What information does the organisation collect?

Ultra collects and uses various types of information about you. This may include:

- Your name, address and contact details, including e-mail address and telephone number
- Details of your academic qualifications, other training or qualifications, skills, experience and employment history
- + Reference information
- Your completed psychometric questionnaire
- Your completed agility test, whether online or on paper
- Your completed technical tests
- Any other preparation for the interview such as a presentation
- Selection information, including correspondence, interview notes and internal notes
- Information about your current level of remuneration, future salary expectations and current benefit entitlements
- Information about why you are applying for the role and reasons for leaving your previous role
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK, length of residency, nationality and place of birth
- Information about current or previous security clearance held
- Information about your unspent convictions
- On site CCTV information
- Registration of site visitor information, including dates and times of visits to Ultra sites
- Publicly available information about you, your social media presence for example

# 7. The source of the information collected?

Ultra collects this information in a variety of ways. For example, personal data might be contained in application forms, CVs, resumes, or supplied via a recruitment agency by e-mail or on a summary sheet. Information may be obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Ultra will also collect personal data about you from other parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks or the UK Security Vetting (UKSV) or Disclosure Scotland. The organisation will seek information from other parties only once a job offer to you has been made and will inform you that it is doing so. Should the process be commenced earlier than this, Ultra will discuss this with you in advance.

# 8. How is the information stored?

Personal data will be stored in a range of different places, including the recruitment pack related to the specific job role, via your application record, in myHR (our HR management system) and other IT systems (including e-mail).

### 9. Why does the organisation process personal data?

#### • To perform a contract

Ultra needs to process personal data to take the necessary recruitment and selection process steps at your request prior to entering a contract with you.

#### Legal obligation

In some cases, Ultra needs to process personal data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

#### Legitimate interest

Ultra has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing personal data from job applicants allows Ultra to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Ultra may also need to process personal data from job applicants to respond to and defend against legal claims.

Where Ultra relies on legitimate interests as a reason for processing personal data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

# **10.** Special category (sensitive) information

Ultra processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the organisation processes other special categories of personal data, such as information about ethnic origin, health or religion or belief, this is for equal opportunities monitoring purposes.

For all roles within Ultra, the company is obliged to seek information about criminal convictions and offences. Where Ultra seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The organisation will not use your personal data for any purpose other than the recruitment exercise for which you have applied.

#### 11. Who has access to personal data?

Your information will be shared internally for the purposes of the recruitment process. This includes members of the HR and Talent Management teams, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the personal data is necessary for the performance of their roles.

Ultra will not share your personal data with other parties, unless your application for employment is successful and it makes you an offer of employment. Ultra will then share your personal data with former employers to obtain references for you, obtain employment background checks from other party providers and obtain necessary criminal records checks from the UK Security Vetting (UKSV) and Disclosure Scotland.

# 12. Transferring personal data outside the UK and European Economic Area (EEA)

Your personal data may be transferred outside the UK and European Economic Area (EEA) to conduct recruitment and selection interviews. In such cases appropriate safeguards will be put in place.

#### 13. How does Ultra protect personal data?

Ultra takes the security of your personal data seriously. It has internal policies and controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Refer to the Ultra data privacy notice for further information (section 5 above).

# 14. How long does Ultra keep personal data?

Unless otherwise agreed, if your application for employment is unsuccessful, Ultra will hold your personal data on file for twelve (12) months after the end of the relevant recruitment process. If your application for employment or to provide a service is successful, personal data gathered during the recruitment process will be transferred to your HR file and retained during your employment or the duration of the supplier / service agreement. Retention periods will be provided to you in the Employee and Contingent Worker Privacy Notice when you commence employment.

# 15. Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your personal data on request
- require Ultra to change incorrect or incomplete personal data
- require Ultra to delete or stop processing your personal data, for example where the personal data is no longer necessary for the purposes of processing
- object to the processing of your personal data where Ultra is relying on its legitimate interests as the legal ground for processing
- ask Ultra to stop processing personal data for a period if personal data is inaccurate or there is a dispute about whether or not your interests override Ultra's legitimate grounds for processing personal data

If you would like to exercise any of these rights you can do so in person, via telephone, by email, letter or fax addressed to the HR team of the business you were applying to join. Alternative requests can be made via a member of the Talent Management team.

In order to respond HR or Talent Management may request further information from the reporting individual as may be necessary to identify the nature of the request and respond accordingly.

# 16. Right to complain

You have the right at any time to raise concerns with a data protection supervisory authority directly. We encourage you to contact us in the first instance as we aim to promptly, efficiently and satisfactorily resolve any questions or concerns you have in relation to your personal data.

The Information Commissioner's Office (ICO) is the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found by accessing their website: <u>https://ico.org.uk</u>.

# 17. What if you do not provide personal data?

You have no statutory or contractual obligation to provide personal data to Ultra during the recruitment process. However, if you do not provide the information, Ultra may not be able to process your application properly or at all.

You have no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

# 18. Automated decision making

Recruitment processes are not based solely on automated decision making.

#### **19.** Document review

The Company reserves the right to change, amend or review this notice as required from time to time at its discretion.