

To view our Business Partner Privacy Policy please click [here](#). Our Employee Privacy Policy is available on our Internal [Integrated Management System](#) SharePoint Site.

## **WHO ARE WE?**

This Privacy Statement is applicable to the processing by Balcas, based at 75 Killadeas Road, Laragh, Ballinmallard, Enniskillen, Co. Fermanagh, Northern Ireland, BT94 2ES (hereafter referred to as “Our Company”, we or us) of all personal data of individuals in the field of recruitment (“Applicants”).

Our Company is the controller for the processing of Applicant’s personal data. In this statement we describe who we are, how and for which purposes we process your personal data and all other information that may be relevant to you. In case you have any additional questions you can contact us via the contact details provided at the bottom of this statement.

This Privacy Statement applies since 25<sup>th</sup> April 2018. The last modifications were made on 5<sup>th</sup> February 2020. This statement may change over time and the most up-to-date version is published on our website. <https://www.balcas.com/careers/> If significant changes are being made during your application, we will actively inform you.

## **FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?**

We collect and process personal data of Applicants for the purposes of the recruitment and selection procedure and to ensure its efficient and effective functioning:

### **A. To communicate with you regarding your employment or job application**

If you have shown interest in a position within Our Company, we store your personal data in our relevant recruitment systems. We use the data in our systems to communicate with you and to determine whether your qualifications and profile meet the requirements of a specific vacancy.

For this purpose

- we process your personal data on the basis of your consent when you provide us with your personal data
- we process your contact details, recruitment information (such as your resume, employment history, education history etc.) and correspondence with us with regard to job applications (including references)

**B. To answer your questions**

If you get in touch with us, we will use your personal data in order to reply and answer your question(s).

For this purpose

- we process your personal data on the basis of your consent
- we process your name, contact details, your correspondence with us with regard to your question and all other personal data, which are necessary to answer your question(s)

**C. To assess and evaluate you during the recruitment procedure**

During the recruitment procedure, screening (for example in the form of a skills assessment) may be part of the procedure.

For this purpose

- we process your personal data on the basis of our legitimate interest that overrides your interests. It is in our interest to select applicants which qualifications and profile meets the requirements of a specific vacancy with Our Company
- we process the information you provide us with and all information relevant to your assessment.

**D. To enter into an employment contract with you**

If we offer you a position at Our Company, we will process your personal data to prepare and process an employment agreement. We use your personal data for the conclusion, execution and termination of your employment agreement. We will then also store your personal data in our HR systems.

For this purpose

- we process your personal data because it is necessary for entering into an employment contract with you
- we process your contact details, date of birth, gender, civil status, nationality, national service number, ID card or passport details, declaration of employment status, chamber of commerce and VAT details, recruitment information (such as employment history, education history details), job and position data, work permit details, availability, terms of employment, tax details, payment details, insurance details and location and organizations, and any other information deemed necessary for the Human Resources and Payroll function.

**E. Social networks, such as LinkedIn, and other publicly available websites**

We may collect your personal data from public profiles on LinkedIn or other social networks and other publicly available websites if you reacted to Our Company recruitment initiatives on such social networks and websites, or signed up via integrated functionality of such social networks, recruitment websites or our own websites. We also may collect your personal data from such sources when you provided a link to your profile on any such site as part of your job application or curriculum vitae submitted with your job application.

We may also obtain your contact details from publicly available sources, including content that you have made public on LinkedIn or other social network sites or similar sites for professional purposes to make an initial contact with you for recruitment purposes. We will contact you if you have made your contact details available to Our Company to contact you for recruitment purposes and will provide you with clear option to ask us stop contacting you for career opportunities and remove your personal data from our systems.

We may also communicate with you on social media or via communications apps such as WhatsApp if you are connected to us, if you use social media or a communication app or if you post a photo or video linked to Our Company or our products

For this purpose

- we process your personal data based on our legitimate interest and we process your personal data to find suitable candidates for vacancies at Our Company
- we process the personal data you have made public through your public profiles on LinkedIn or other social networks and any correspondence between you and our recruiters. This includes your name, contact details if made available, current and past job titles, employment history, educational information, skills, recommendations, and curriculum vitae if you made it available.

**F. To protect your vital interests**

When it is necessary to process your personal data to protect your vital interests, we will do so. This could, for example, be the case when you have a physical disability or medical condition that we need to be aware of when you are visiting us at our premises.

For this purpose

- we process your personal data to protect your vital interest and we will process your personal data if it is necessary to avoid a risk of injury or other damage to your health
- we process your contact details, the contact details of your emergency contact, the location of your Company site and the relevant health data that you provided to us.

**G. To inform you and communicate with you about other vacancies**

Sometimes, we just do not have the right role available for you yet. If you choose, we will keep information about you in our systems and contact you if we have a new vacancy that may be of interest to you. We may also invite you for recruitment activities or communicate with you about job opportunities.

For this purpose

- we will process your personal data based on your consent when you choose to keep your information in our systems
- we process your contact details (such as your address and email address), the information you submitted to us in the course of previous job applications (for example, your resume) and a summary of how you performed during previous job applications with us.

**H. To comply with the law**

In some cases, Our Company processes your personal data to comply with the laws and regulations in the country where you applied. For example, human resources related obligations, employment laws, anti-discrimination laws or regulations related to subsidies. Following laws and regulations, we may need to disclose your personal data to government institutions or supervisory authorities.

For this purpose

- we process your personal data to comply with the law and we will only process your personal data if there is a legal obligation for us to do so.

**I. To protect health, safety, security and to ensure integrity**

At Our Company, we value your health, safety, security and integrity highly. When you visit us, we process your personal data in order to safeguard our employees, customers, suppliers and business partners. As such, we authenticate your access rights to our premises. We also process your personal data to protect Our Company and employee and customer assets. More specifically, we protect our premises by using CCTV cameras that register what happens in our property.

For this purpose

- we may process your personal data based on our legitimate interest to monitor our internal processes and the protection of society and our habitat as well as our property and in order to comply with the law (transport, environmental and health and safety laws and regulations)

- we process your contact details, relevant personnel file details, insurance details, location and organizations and the relevant health data that you provided to us and CCTV imagery

## **J. To safely deliver our products**

Before you start working for Our Company, please note that we use vehicle technology to know where its trucks are located at any given moment for environmental and health and safety purposes, promoting safe driving and to protect the well-being of employees and environment, for public security and protection of property (tracking stolen trucks for malicious purposes and for efficient driving) and for efficient driving and a reduction of CO2 emission as a result from more efficient driving. This is particularly relevant if you are planning to become a driver.

For this purpose

- we may process your personal data based on our legitimate interest to monitor our internal processes and the protection of society and our habitat as well as our property and in order to comply with the law (transport, environmental and health and safety laws and regulations)
- we process your contact details, relevant personnel file details, insurance details, location and organizations and the relevant health data that you provided to us, CCTV imagery, telematics data including vehicle data regarding route, speed, acceleration, breaking, turns, functioning of the vehicle and driver-facing camera imagery

## **HOW LONG DO WE RETAIN YOUR PERSONAL DATA?**

Our Company generally shall retain Applicant Data only for the period required to serve the applicable Business Purpose, to the extent reasonably necessary to comply with an applicable legal requirement or as advisable in light of an applicable statute of limitations.

Promptly after the applicable storage period has ended, the Data shall be:

- i. securely deleted or destroyed;
- ii. anonymized;
- iii. transferred to an Archive (unless this is prohibited by law or an applicable records retention schedule)

## **WHO HAS ACCESS TO YOUR PERSONAL DATA?**

### **Access to your personal data within Our Company**

The employees involved in the relevant recruitment procedure may have access to your personal data, be it only to the extent necessary to fulfil their respective tasks. These employees are for example our recruiters, HR employees and the relevant manager.

Your personal data may be accessed by other relevant departments within Our Company such as IT, Legal and Compliance, to the extent necessary to fulfil their respective tasks.

In some cases, your personal data may be transferred to a country that does not provide an adequate level of protection of personal data. However, Our Company has taken measures to ensure that your personal data is adequately protected as Binding Corporate Rules are applicable throughout the group that Our Company belongs to.

### **Access to your personal data by third parties**

The following third parties may have access to your personal data where relevant for the provisioning of their products or services to Our Company: Recruitment Agencies, Assessment Centres. IT Suppliers, Occupational Health Providers, Drug and Alcohol Testing and any third parties deemed necessary for the recruitment process.

When third parties are given access to your personal data, Our Company will take the required contractual, technical and organisational measures to ensure that your personal data are only processed to the extent that such processing is necessary. The third parties will only process your personal data in accordance with applicable law.

If personal data is transferred to a third party in a country that does not provide an adequate level of protection of personal data, we will take measures to ensure that your personal data is adequately protected, such as entering into EU Standard Contractual Clauses with these recipients.

In other cases, your personal data will not be supplied to third parties, except when required by law.

## **HOW IS YOUR PERSONAL DATA SECURED?**

We have taken adequate safeguards to ensure the confidentiality and security of your personal data. We have implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited to unnecessary collection) or further processing.

## **HOW CAN YOU EXERCISE YOUR PRIVACY RIGHTS?**

You have the right to request access to or an overview of your personal data, and under certain conditions, rectification and/or erasure of personal data. In addition, you may also have the right of restriction of processing concerning your personal data, the right to object to processing as well as the right to data portability.

To invoke your privacy rights, please contact us by using the contact details at the bottom of this Privacy Statement. Keep in mind that we may ask for additional information to verify your identity.

## **CAN YOU WITHDRAW YOUR CONSENT?**

Once given, you may always withdraw your consent. Please keep in mind that withdrawal does not have retrospective effect and the withdrawal of your consent is only possible in case you first have given your consent. Please contact us to withdraw your consent by using the contact details at the bottom of this Privacy Statement.

## **HOW TO LODGE A COMPLAINT?**

If you have a complaint about the use of your personal data by Our Company, you can lodge a complaint via the contact details at the bottom of this statement. Besides lodging a complaint with Our Company, you are also able to lodge a complaint with your local data protection supervisory authority.

## **CONTACT US**

If you want any further information about the way we process your personal data or have any other privacy questions relating to us, we'd be happy to help you.

Our contact details are:

[privacy@balcas.com](mailto:privacy@balcas.com)

Thank you for taking the time to visit read about how we use your information.

## **EFFECTIVE DATE:**

This policy was last modified on 5<sup>th</sup> February 2020