

E-PPL Holdings Group Privacy Notice

As the controller of your data, E-PPL Holdings Limited and its subsidiaries comply with Data Protection laws in the United Kingdom (The Data Protection Act 2018) and the EU General Data Protection Regulation (GDPR). This Privacy Notice details how E-PPL Holdings Limited and its subsidiaries processes your personal data

The personal data we collect about you

Personal data collected, used and stored by us may include:

- Identity Data including forenames, last name, date of birth.
- Contact Data including home address, email address and telephone numbers
- Technical Data including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the E-PPL and Autoscan websites

How do we collect your personal data?

Personal data is collected by us using the following methods:

- Direct interactions with E-PPL Holdings Limited and its subsidiaries in person, by post, phone, email or otherwise when applying for a job role with one of our companies.
- Automated technologies or interactions with our website, by using the contact us pages.
- Third parties or publicly available sources (processing Identity, contact and qualification categories of personal data) such as:
 - Job boards that you have registered with.
 - Authorised recruitment partners with whom you have given your explicit consent.
 - LinkedIn

How do we use your personal data?

We use your personal data in the following circumstances and relying on the following lawful basis for processing:

Purpose / Activity	Type(s) of data	Lawful basis for processing
Initial engagement with you to discuss your requirements or enquiry.	<ul style="list-style-type: none"> • Identity • Contact 	Consent. Or inferred consent by you contacting us
Service delivery	<ul style="list-style-type: none"> • Identity • Contact 	Performance of a contract. To comply with legal obligations
Recruitment of personnel	<ul style="list-style-type: none"> • Identity • Contact • Right to work documentation • Employment history • Qualifications 	To comply with a legal obligation. To enable the performance of a legitimate contract. Necessary for our legitimate interests (for running our business, provision of administration – including preparation for payroll and invoice payment).
Internal record keeping	<ul style="list-style-type: none"> • Identity • Contact • Right to work documentation 	To comply with a legal obligation. To enable the performance of a legitimate contract.

	<ul style="list-style-type: none"> ● Banking information ● Performance and training records ● CCTV Recordings 	<p>Necessary for our legitimate interests (for running our business, provision of administration – including payroll and invoice payment).</p> <p>Operational performance monitoring</p> <p>For health and safety investigation purposes.</p> <p>For the prevention, detection and to provide evidence of a criminal activity to the police or a designated legal representative.</p>
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Change of purpose

We will only use your personal data for the purposes stated above, unless we reasonably consider that we need to use it for another reason and it is compatible with the original purpose. Please contact us for an explanation as to how any new processing compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Changes to our Privacy Notice

We keep our Privacy Notice under regular review and we will place any updates on our web pages.

Marketing communications

We do not use your data for any marketing purposes.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to only those E-PPL Holdings Limited and its subsidiaries staff, business partners and suppliers who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioners Office of a breach where we are legally required to do so.

Cookies

The E-PPL Holdings subsidiaries websites only use an ASP.NET SessionId cookie.

The ASP.NET SessionId cookie is a session cookie and it is only temporary. It only stores the username of the person logging in to the customer portal and whether they have successfully authenticated when logging in.

Website Third-party links

E-PPL Holdings Limited and its subsidiaries website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Sharing of personal data outside of the European Economic Area

Some of our external service suppliers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

We may also use specific contracts approved by the European Commission that provide the same level of protection for personal data as it has in the EEA.

Who we disclose personal data to?

Your personal data may be shared with third parties for the following purposes:

Type of recipient	Reason
Applicant Tracking system	E-PPL Holdings Limited and its subsidiaries use an applicant tracking system (ATS) to manage their recruit process. The ATS system used is Workable. Workable is a GDPR compliant system which is certified to ISO 27001
Recruitment Partners	E-PPL Holdings Limited and its subsidiaries on occasion use the services of approved recruitment partners to assist in the provision of personnel. We share information with our approved recruitment partners for administrative purposes, including payroll, invoice payment and operational service improvement reasons.
Right to work Checking Service	E-PPL Holdings Limited and its subsidiaries ensure that the processing of personal data relating to right to work checking is carried out only under the control of official authority. E-PPL Holdings Limited and its subsidiaries utilise the services of the UK Government via the website https://www.gov.uk/view-right-to-work for all non-UK or Irish nationals. UK and Irish nationals are right to work checked by viewing their original right to work documentation.
Criminal Record Checking Service	E-PPL Holdings Limited and its subsidiaries ensure that the processing of personal data relating to criminal convictions and offences or related security measures based on <u>Article 6</u> (1) of the GDPR is carried out only under the control of official authority. E-PPL Holdings Limited and its subsidiaries utilise the services of Verifile Limited (Company Registration Number: 05129976) who are certified to the following international and British standards: ISO 27001, ISO 9001, Cyber Essentials Plus, NSI Gold. Verifile Limited liaise directly with the UK Disclosure and Barring service. The Verifile system has advanced security measures to secure and protect your personal information, such as internal and external firewalls, monitoring and alert systems to prevent and detect intrusion attempts, and 128-bit encryption of data in transit and at rest.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your personal data, and to use your personal data only in the course of providing such services and in accordance with E-PPL Holdings Limited and its subsidiaries instructions.

How long is your personal data retained?

We only retain your personal data for as long as necessary. The table below outlines how long data is retained, and depends on the reason the personal data is used for:

Purpose of Processing	Retention period
Application for a Job	E-PPL Holdings Limited and its subsidiaries will request that all applicants and sourced candidates must view and agree to this Privacy Notice. Upon acceptance of the Privacy Notice & giving explicit consent to the processing of their data, the data will be retained for 24 months from date of acceptance, or 12 months from date of last communication (whichever is later). If no consent is given, the applicant data will be deleted in 30 days.
Employment	E-PPL Holdings Limited and its subsidiaries will retain employee data for the duration of their employment, until 7 years from either the last working day or the end of notice period (whichever is later) to enable compliance with all UK legislation.
Health and Safety	E-PPL Holdings Limited and its subsidiaries will retain health and safety documentation indefinitely.

Your legal rights regarding your personal data

After these retention periods if there is no legal basis for retaining your personal data, E-PPL Holdings Limited and its subsidiaries will either securely delete or anonymise it so that it can be used for statistical purposes but without any method of identifying you individually.

You have the right to:

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data. This enables you to have any incomplete or inaccurate data corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You can also ask us to delete your personal data where you have successfully objected to the processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to delete the data for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data 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 as you feel it 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.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful, but you do not want us to erase it;
 - (c) where you need us to hold the data 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 data, but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Questions

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights regarding your personal data, please contact the Info Sec Coordinator by emailing infosec@e-ppl.co.uk or by writing to us. We will respond to you as soon as is possible. The length of time will depend on the type and complexity of the request, but you will receive a response no later than 30 days from the initial request.

What if I am still not satisfied?

If you are not satisfied with how E-PPL Holdings Limited or any of its subsidiaries have responded to your enquiry, you have the right to complain to the [Information Commissioner's Office \(ICO\)](#), who is the regulator for data protection in the United Kingdom.

Please call us on **0845 519 0607** if you have any queries