

Recruitment Data Protection Policy

Pepper has created this data protection policy as the controller of candidate's personal data to demonstrate our firm commitment to privacy and to inform candidates about the information we collect and process in connection with your application. If you have any queries about this notice, please contact our Data Protection Officer.

This policy sets out an explanation of what information about you we process, why we process your information, with whom your information is shared and a description of your rights with respect to your information.

What information do we process?

As a prospective employer, we need to keep and process certain information about you for normal recruitment and HR management purposes.

The term 'personal data' means any information concerning or relating to a living person who is either identified or identifiable. Personal data is normally obtained directly from you. In certain circumstances, it will, however, be necessary to obtain data from third parties e.g., references from previous employers.

As part of the recruitment and job application process, we will collect personal data which may include:

- Personal details such as your name, surname, title and other information provided in your CV
- Contact information such as phone number, email address and home address
- Education and employment history such as names and addresses of previous employers and educational institutions, dates attended, and roles held
- Details about your qualifications such as education, certifications, skills and professional achievements
- Details of your eligibility to work in Ireland (e.g. your nationality, residency, citizenship or visa details)
- Details of any special assistance you may require if called for interview
- Assessment material such as psychometric test results, evaluations from interviews and any responses provided at interview stage
- For Executive level appointments, as part of our hiring process, we may conduct a pre-employment medical screening to assess your fitness for the role and to ensure a safe working environment. This process involves the collection of certain health-related personal data the business will collect information which may be deemed sensitive including a medical screen with the business's occupational health specialist.

How do we use your information?

The information we hold, and process will be used for recruitment administrative purposes and for assessing your suitability for available roles within the company.

The processing is necessary to ensure that the company complies with its legal obligations relevant to the recruitment process, to enter into a contract with you should you be successful in the recruitment process and for our legitimate interests in managing an effective recruitment process in circumstances where such interests are not overridden by the rights and freedoms of the data subject.

It might also be necessary to process your information to establish, exercise or defend legal claims.

How is your information shared?

We do not share your personal data except in the limited cases described below:

- The HR team within the company who are primarily responsible for recruitment
- Individuals within Pepper who are involved in recruitment matters such as screening and interviewing
- Individuals who would have managerial responsibility for you or are acting on their behalf
- Recruiters (where your application is being handled by an external recruiter)
- Previous employers where you have listed them as your reference
- Professional advisors e.g., legal advisors

Will your information be transferred abroad?

Your information will not be transferred abroad.

How long do we keep your information?

Any personal data processed about you is retained only for as long as it is required.

Where you are a successful job applicant, the personal data provided by you and generated by the company over the course of the recruitment process will be retained by Pepper for the purpose of your contract of employment. This personal data will be securely stored in accordance with the company Data Protection Notice which will be provided to you on commencement of employment.

Where you are an unsuccessful job applicant, the personal data provided by you and generated by us over the course of the recruitment process will be securely stored for a period of 12 months from the date recruitment processes ceases for a particular role.

What happens if you do not provide us with your information?

In the event that you do not provide us with the personal data required as set out within this notice, we will not be in a position to assess your application, bring you forward for interview or offer you a contract of employment.

Will you be subject to profiling or automated decision making?

You will not be subject to automated decision making or profiling.

What are your rights under data protection law?

You have the following rights under data protection law, although your ability to exercise these rights may be subject to certain conditions:

- The right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data;
- The right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information, you may request that we update the information such that it is complete;
- The right, in certain circumstances, to request that we erase your personal data;
- The right, in certain circumstances, to request that we no longer process your personal data for particular purposes, or object to our use of your personal data or the way in which we process it;
- The right, in certain circumstances, to transfer your personal data to another organisation;
- The right to object to automated decision making and/or profiling; and
- The right to complain to the Data Protection Commissioner.

Further information

If you have any queries in relation to this data protection notice, or if you have any concerns as to how your data is processed, please contact the Data Protection Officer or Director of Compliance.

Review

This data protection policy will be reviewed from time to time to take into account changes in the law and the experience of the notice in practice.