



## CANDIDATE PRIVACY NOTICE

### 1 Introduction

- 1.1 We take your privacy seriously. You can find out more here about your privacy rights and how we gather, use and share personal data about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (EU) 2016/679.
- 1.2 It is important that you read this notice. We will update this notice if we make any significant changes affecting how we use your personal data, and if so we will contact you to let you know about the change.

### 2 About us

- 2.1 When we say 'Group' in this notice, we mean Pinewood Group Limited (**PGL**), Pinewood Studios Limited (**PSL**) and Shepperton Studios Limited (**SSL**) together with their subsidiaries and associated companies. PGL (company number 03889552) is registered with the Information Commissioner's Office, or ICO, under registration number Z1411806. PSL (company number 0392619) is registered with the ICO under registration number Z5350189. SSL (company number 02974333) is registered with the ICO under registration number Z730567X. The registered office of PGL, PSL and SSL is Pinewood Studios, Pinewood Road, Iver, Buckinghamshire, SL0 0NG.
- 2.2 You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor) and we will be the 'controller' of your personal data and are referred to as **we**, **us** or **our** in this notice.
- 2.3 This Notice may be amended at any time.

### 3 Your Rights

- 3.1 In addition to the right to be informed about how we use your personal data (as set out in this Notice), you have various other rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact [dataprotection@pinewoodgroup.com](mailto:dataprotection@pinewoodgroup.com):
  - **Right to object:** You can object to our 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. You also have the right to object where we are processing your personal data for direct marketing purposes. Please contact us as noted above, providing details of your objection.
  - **Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. Please make all requests for access in writing, and provide us with evidence of your identity.
  - **Consent:** Most of the time, we will not need your consent to use your personal data as we will be using it only to fulfil our obligations and exercise our rights in relation to your

application to work for us. However, where you have given us your consent to use personal data, you can withdraw your consent at any time.

- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated decision-making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in the course of you working with us, but we will notify you in advance if this changes.

3.2 Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

#### **4 Personal Data We May Collect About You**

4.1 In connection with your application for work with us, we will collect, store, and use the following categories of personal data about you:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- your photograph;
- date of birth;
- identification information (including a copy of driving licence and passport and utility bills);
- the information you have provided to us in your CV and covering letter, and application forms;
- information you provide to us at interview;
- gender;
- salary, annual leave, pension and benefits information;
- right to work documentation; and
- CCTV footage and other information obtained through electronic means such as security access fobs and card records if you come to our premises for an interview.

4.2 Some kinds of personal data are given special protection by the law. This includes information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership ('special categories of personal data') or criminal convictions or offences. We will sometimes collect, store and use the following:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, for example if you have completed an Equal Opportunities and Diversity Monitoring form(s);
- information about your health, including any medical condition, health and sickness records;
- trade union membership;
- Criminal Record Bureau (CRB) checks; and
- Information about you from reference checks.

## **5 How We Collect your Personal Data**

We will obtain your personal data in different ways:

- directly from you, for example when you fill out forms;
- from monitoring emails;
- from external third-party providers (such as recruitment agencies, background check providers, credit reference agencies, the CRB checks and your named referees); and
- from publicly accessible sources, such as LinkedIn.

## **6 How We Use your Personal Data**

6.1 To summarise, we process your personal data for the following key purposes:

- primarily, to assess your skills, qualifications and suitability for the role;
- to carry out background and reference checks, where applicable;
- to communicate with you about and during the recruitment process;
- to keep records relating to our hiring processes and procedures;
- to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests, or where necessary to protect the interests of you or others (for example, site security and monitoring at our premises via CCTV).

## **7 Sensitive Personal Data**

7.1 We process the special categories of personal data mentioned above primarily to comply with our legal obligations, including:

- (a) in respect of health and safety to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made at interview;
- (b) information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and
- (c) information about criminal convictions history if we decide to offer you the role; offers are conditional on checks and other conditions, such as references, being satisfactory.

## **8 If You Fail to Provide Personal Data**

In some cases, if you fail to provide information when requested, we may not be able to process your application. For example, if we require a credit check or references for the role and you fail to provide us with details, we will not be able to take your application further.

## **9 Monitoring**

9.1 It is necessary for us to monitor persons at our premises in various ways in order to ensure safety and security and protect our staff and our business. We monitor candidates in the following ways:

- you may be captured by CCTV systems we use for security and disciplinary purposes;
- equality and diversity monitoring;
- monitoring entry onto our premises and areas of our premises.

9.2 We process personal data obtained through such monitoring in accordance with our internal policies and only carry these activities to the extent it is necessary and proportionate and it is permitted by law.

9.3 If you have any concerns or questions in relation to monitoring, please email [dataprotection@pinewoodgroup.com](mailto:dataprotection@pinewoodgroup.com).

## **10 Our Legal Basis for Using your Personal Data**

We only use your personal data where it is permitted by the laws that protect your privacy rights.

## **11 Sharing your Personal Data With Others**

11.1 We will share your personal data with third parties where required by law, or where it is necessary to administer the working relationship with you or where we have a legitimate interest. We will only share your personal data to the extent needed for those purposes.

11.2 We share personal data for these purposes with:

- Group companies; and
- external providers such as CRB and reference checks.

11.3 Occasionally, we may need to disclose your personal data to third parties where necessary for the legitimate interests of business or in order to comply with legal obligations:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if any Group company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, enforce or apply our Website terms of use or other agreements, or to protect the rights, property or safety of the Group, our customers or others.

## **12 Data Retention**

- 12.1 We do not retain your personal data for any longer than is necessary for the purposes for which we need to use it, in line with our Data Retention Policy.
- 12.2 We will generally keep your applications for between 6 and 12 months after notifying unsuccessful candidates (or longer, if there is a clearly communicated policy to keep candidates CVs for future reference). In some circumstances, we will hold personal data for longer where necessary for active or potential legal proceedings, or to resolve or defend claims.

## **13 Transfers Outside the UK**

- 13.1 We may need to transfer your personal data outside the UK to other service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area.
- 13.2 We will take all steps reasonably necessary to ensure that your personal data is handled securely and in accordance with this notice and the data protection legislation. These include ensuring, where the country does not provide an adequate level of protection, that our overseas suppliers enter into a European Commission approved contract. Some US providers may also be certified under the EU-US Privacy Shield which confirms they have appropriate measures in place to ensure the protection of your personal data. If you would like further information, please contact [dataprotection@pinewoodgroup.com](mailto:dataprotection@pinewoodgroup.com).

## **14 Right to Complain**

You can make a complaint to us by [dataprotection@pinewoodgroup.com](mailto:dataprotection@pinewoodgroup.com) or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.