

FIRST CIRCLE PACKAGING LIMITED

PRIVACY POLICY

First Circle Packaging Limited collects and processes personal data relating to job applicants and customers. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. This Data Privacy Notice explains how we will use your personal information. For the purposes of data protection legislation, we are a data controller and sometimes use third parties to process your data on our behalf.

This privacy notice applies to personal information about:

- New job applicants
- Customers
- Website visitors

New Job Applicants

1. What information does the organisation collect?

The organisation collects a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration, including benefit entitlements
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process and:
- Information about your entitlement to work in the UK.

The organisation may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through emails, interviews or other forms of assessment, including online tests.

The organisation may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Customers

First Circle Packaging may require personal information to interact with our customers, produce quotations/proposals, respond to enquiries and fulfil the contracts and orders made with us. As such we process the contact information of business customers in order to communicate with them regarding their enquires, send quotations/proposals and contracts, organise subsequent order fulfilment arrangements and send any official documentation to them. Contact information is also stored to identify inbound communications, to authenticate customers when they contact us and may also be used in emergency situations if necessary.

This information is stored in our corporate systems for the duration of the business relationship and a further 2 years after the expiry of the contract. This information is used only for the purposes outlined above and in line with the company's Data Protection Policy.

Website Visitors

You may visit and browse our website without providing any contacts details.

You may wish to provide your contact details (name, email address, job title and telephone number) if you choose to submit a web enquiry or request to be contacted by us.

2. Why does the organisation process personal data?

The organisation needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you. In some cases, the organisation needs to process 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.

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

The organisation may process special categories of data, such as information about ethnic origin, sexual orientation, religion or belief in order to monitor recruitment statistics and ensure fairness in our processes. This information is processed separately to the job application and is stored in anonymised form. Where necessary, we may also collect information about whether or not applicant is disabled in order to make reasonable adjustments for candidates. The organisation processes this information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation 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.

3. Who has access to data?

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

The organisation will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks. The organisation will not transfer your data outside the European Economic Area, unless your application for employment is successful and it makes you an offer of employment. Please refer to our employee privacy notice for further details.

4. How does the organisation protect data?

The organisation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. In addition to system restrictions put in place by appropriate job roles.

5. For how long does the organisation keep data?

If your application for employment is successful, personal data collected during the recruitment process will be transferred to your personnel file. This information is kept for the duration of your employment with us, some is retained past this point in line with our data retention schedule that will be made available to all employees.

For unsuccessful applicants, we will hold your data on file for up to 6 months for consideration for future employment opportunities if you have indicated to us that you would like to be considered for other positions. At the end of that period or if you have indicated you do not wish to be considered for other roles, this information is securely destroyed.

6. Your rights

As a data subject, you have a number of rights in relation to the processing of their personal information by the organisation including the right to:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;

- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please make a request in writing, stating the purpose of your request, your name and a contact address and phone number to:

**HR DEPARTMENT
FIRST CIRCLE PACKAGING LIMITED
JENNA WAY
INTERCHANGE PARK
NEWPORT PAGNELL
BUCKS
MK16 9QJ**

Please be aware, we may need you to provide additional information (such as to confirm your identity and/or to confirm what information you wish to access) in order to process your request.

If you have any queries or concerns regarding the processing of your personal information, please do not hesitate to contact us. If you believe that the organisation has not adequately addressed your concerns in a timely way, you have the right to complain to the Regulator (Information Commissioner's Office).

7. What if you do not provide personal data?

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