



Valeo Foods Candidate Privacy Notice

What is the purpose of this document?

This Privacy Notice and Data Retention document sets out how and why your personal data will be used, namely for the purposes of recruitment, and how long it will usually be retained for. It provides you with certain information that must be provided under the Data Protection Act 2018 (“DPA 2018”), the UK General Data Protection Regulation (UK GDPR) and any other applicable data protection law, each as amended or updated from time to time.

Data protection principles

We will comply with data protection law and principles, which means that your personal data will be:

- used lawfully, fairly and in a transparent way.
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- relevant to the purposes we have told you about and limited only to those purposes.
- accurate and kept up to date.
- kept only as long as necessary for the purposes we have told you about.
- kept securely.
- subject to accountability ensuring that we comply with the law when processing your personal data.

Collecting personal data

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

- any information you have provided to us in your curriculum vitae and covering letter;
- any information you have provided on our application form, including but not limited to name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications;
- any information you have provided to a recruitment agency that may include your name, date of birth or age, gender, qualifications, experience, employment history or any other information which is passed to us by the agency for consideration in connection with a specific vacancy;

- any information you provide to us during an interview, including during any tests we run as part of the interview process;
- qualification certificates, medical questionnaire, references, ID documentation and right to work documentation.

If we would like to offer you a role, we may also collect, store and use the following special categories (sensitive) information:

- information about your race or ethnicity;
- information about your health, including any medical condition, health and sickness records; and
- information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- you, the candidate;
- recruitment agency; and
- your named referees.

How we will use information about you

We will use the personal information we collect about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out background and reference checks, where applicable;
- communicate with you or the recruitment agency about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

The legal basis for processing your personal data is legitimate interests in order to enable us to decide whether to appoint you to a role within our business. In the case of special category personal data, the legal basis for processing is legitimate interests and we need to carry out our legal obligations and exercise rights in connection with employment.

Having received your CV/covering letter, or your application form, or your details from a recruitment agency, and the results from any test which you took as part of the recruitment process (if applicable), we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references before confirming your appointment.

If you fail to provide personal information

If you fail to provide information which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

How we use special category information

We will use your special category information in the following ways:

- information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview;
- information about your race, or nationality, or ethnic origin to ensure meaningful equal opportunity monitoring and reporting. Any report produced will use anonymised data so that it is not possible to identify you.

Information about criminal convictions

We may process information about criminal convictions such as information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory).

We have in place appropriate policy documents and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- where we have notified you of the decision and given you 21 days to request a reconsideration;
- where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights; or
- in limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

We currently do not use automated decision making. However, you will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Data sharing

We will only share your personal information with the following third parties for the purposes of processing your application: recruitment agency and/or other entities within our company group or software providers. The other entities within our group or software providers used by us are required to take appropriate security measures to protect your personal information in line with our policies, notices, procedures and the data protection law. We do not allow the other group entities to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. In relation to recruitment agencies, we only deal with a selected number of agencies from a preferred supplier list. We also have a contract in place with those agencies obliging compliance with current data protection legislation.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, recruitment agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data Retention Policy or applicable laws and regulations save that our computer system may retain one electronic back up copy of the personal information solely for archival, audit, disaster recovery, legal and/or regulatory purposes and it may not be used for any other purpose. Such personal information will be held securely and remain subject to the obligations, restrictions and measures imposed by the UK's data protection law.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information; under certain circumstances, by law you have the right to:

- **request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **object to processing** You have the right to object where we are processing your personal information.

- **request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing (see below).

Right to withdraw consent

When you applied for this role, our legitimate interests enabled us to process your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our Retention Policy, we will dispose of your personal data securely.

Data protection officers (DPO)

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO, details below. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Valeo Snack Foods (includes Kettle Foods, Valeo Confectionery, New World Foods and Yellow Chips)

DPO : Susie Faithfull, Legal Counsel

Address : Valeo Snackfoods, 38 Barnard Road, Bowthorpe, Norwich, Norfolk NR5 9JP.

Email: Susie.faithfull@valeosnackfoods.com

Valeo Foods UK (includes Rowse Honey and Matthew Walker)

DPO : Camilla Wesson, Head of HR

Email Camilla.wesson@valeofoods.co.uk

Address : Moreton Ave, Wallingford OX10 9DE

ICO : Helpline telephone number 0303 123 1113 (local rate) or 01625 545745 (national rate); live chat via the ICO's website at www.ico.org.uk (the helpline and live chat options are available Monday to Friday 9 a.m. to 5 p.m. (closed Wednesday's from 1 p.m.)); email: casework@ico.org.uk or other such appropriate email address detailed on the ICO's website (address above); post: Wycliffe House, Water Lane, Winslow, Cheshire SK9 5AF.

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