



## APPLICANT DATA PRIVACY NOTICE

### 1. WHAT IS THIS?

- 1.1. At Saint-Gobain we take privacy seriously and we are committed to protecting it.
- 1.2. In our commitment to protecting privacy, we aim to comply at all times with the EU General Data Protection Regulation 2016 and, once effective, the Data Protection Act 2018, in the UK and the Data Protection Act 2018, in the Republic of Ireland, expected in mid-2018 (together, the “**GDPR**”)
- 1.3. This privacy notice is designed to provide information on how each of the Saint-Gobain UK and Ireland companies and trading names (“**Businesses**”) (referred to as “we”, “us”, “our”) processes personal data of job applicants (referred to as “you”, “your”) who apply to us for a job. A list of each of the Saint-Gobain UK and Ireland companies and businesses is set out in Schedule 1 to this Privacy Notice.
- 1.4. For the purposes of the GDPR, the Company and Business to whom you are applying for a job is the data controller of your personal data. As a “data controller”, we are responsible for deciding how we process personal data about you. We take your privacy seriously and we are fully committed to protecting your personal data at all times. We will only process your personal data in accordance with applicable data protection laws, adhering to the principles (as applicable) contained in the GDPR.
- 1.5. This privacy notice may be amended from time to time to reflect any changes in the way in which we process your personal data. Please check this page occasionally to ensure that you’re happy with any changes.
- 1.6. This privacy notice was last updated on 18 May 2018.

### 2. THE KIND OF INFORMATION THAT WE HOLD ABOUT YOU

- 2.1. “Personal data” is any information about a living individual from which they can be identified such as name, ID number, location data, any online identifier, or any factor specific to the physical, physiological, genetic, mental, economic or social identity of that person. It does not include data where any potential identifiers have been removed (anonymous data) or data held in an unstructured file.
- 2.2. There are “special categories” of more sensitive personal data which are more private in nature and therefore require a higher level of protection, such as genetic data, biometric data for identification purposes, information about sex life or sexual orientation, race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and health.
- 2.3. When we refer to “processing”, this means anything from collecting, using, storing, transferring, disclosing, altering or destroying personal data.

### 3. HOW WE USE YOUR PERSONAL DATA

- 3.1. We process your personal data for various reasons, relying on a variety of different bases for lawful processing under data protection law, as set out below.

3.1.1. **To comply with our legal obligations.** This may include:

- checks for eligibility to work in the UK and Ireland (as appropriate) as required by immigration laws, such as passport and visa documentation;
- formal identification documentation relating to you, such as a passport or driving licence, to verify your identity (including your date of birth);

- information in relation to legal claims made by you or against you, in order to comply with court processes and court orders;
- information relating to the occurrence, investigation or prevention of fraud;
- DVLA/DVSA checks in the UK and RSA checks in Ireland to validate driving licence information including the number of points on your licence if the job role you apply for involves you driving company vehicles.

3.1.2. To pursue our (or a third party's) legitimate interests as a business. This may include:

- your contact details such as your name, address, telephone number and personal email address which will be used to communicate with you in relation to the recruitment process;
- your cv and any or education or employment history, professional qualifications and certifications in order for us to consider your suitability for a job vacancy you are applying for psychometric and other testing;
- employment references provided to us;
- details of the job role you are applying and any notes made by us the recruitment process, in order to assess your suitability for that role;
- pay and benefit discussions with you to help determine whether a job offer may be made to you;
- pre-employment checks such as a Disclosure and Barring Service (DBS) checks (including criminal conviction personal data) to comply with social security and social protection requirements;
- voicemails, emails, correspondence, and other communications created, stored or transmitted by you on or to our computer or communications equipment in order to progress the application through the recruitment process;
- monitoring of the recruitment process; and
- network and information security data in order for us to take steps to protect your information against loss, theft or unauthorised access.

3.1.3. To take steps at your request before entering into a contract. This may include:

- any adjustments that you require for the purposes of interview.

3.1.4. Where you have consented for us to do so.

3.2. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

3.3. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

#### **4. HOW WE USE YOUR SPECIAL CATEGORY PERSONAL DATA**

4.1. We also collect, store and use your special category personal data for a range of reasons, relying on a variety of different bases for lawful processing under the GDPR, as set out below.

4.1.1. **To enable us to perform our legal obligations in respect of employment, social security, social protection law**, or needed in the public interest. This may include:

- health information to assess and/or to comply with our obligations under employment, equal opportunities and health and safety legislation (for example a requirement to make reasonable adjustments to your working conditions).

4.1.2. **For occupational health reasons or where we are assessing your working capability**, subject to appropriate confidentiality safeguards. This may include:

- information about your physical or mental health, or disability status, to assess whether any reasonable adjustments are required for you during the recruitment process, carrying out any medical assessment required for your role, pension and any insurance benefits.

4.1.3. To establish, defend or exercise legal claims in an employment tribunal or any other court of law.

4.1.4. For equal opportunities monitoring purposes (for example the collection of information about race, ethnic origin, sex or religion). Any such information shall only be used in an anonymised form for statistical purposes and will not be used in relation to your application for employment with us.

## **5. AUTOMATED DECISION MAKING / PROFILING**

- 5.1. 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.
- 5.2. Automated decision-making takes place when an electronic system uses information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:
- 5.2.1. Where we have notified you of the decision and given you 21 days to request a reconsideration; and
- 5.2.2. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
- 5.3. If we make an automated decision on the basis of any special category of personal data, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.
- 5.4. "Profiling" means any form of automated processing to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning performance at work, financial situation, health, personal preferences, interests, reliability, behaviour, location or movements.

## **6. DATA SHARING**

- 6.1. We may share your personal data and special category personal data internally. In particular, it may be shared with: HR employees involved in the recruitment process, employee relations and/or administration of any offer of employment; line managers for the role in question; consultants; advisers; and/or other appropriate persons who may be involved in the recruitment process for the job(s) you are applying for.
- 6.2. We may share your personal data and special category personal data with companies within the Saint-Gobain Group. Please see the Saint-Gobain Group Privacy Policy at <https://www.saint-gobain.com/en/privacy-policy>
- 6.3. We may share your personal data and special category personal data with third parties, agents, subcontractors and other organisations (as listed below) where it is necessary to administer a prospective working relationship with you or where we have a lawful basis for:
- occupational health providers;
  - financial product/services providers
  - auditors;
  - payroll and pension providers;
  - insurance providers;
  - employee benefits providers;
  - training providers;
  - testing and assessment organisations
  - recruitment agencies;
  - providers of IT services; and

- providers of legal services.

- 6.4. When we disclose your personal data to third parties, we only disclose to them any personal data that is necessary for them to provide their service and where we are sure that they have adequate policies/procedures in place in relation to data security. We have contracts in place with these third parties in receipt of your personal data requiring them to keep your personal data secure and not to use it other than in accordance with our specific instructions.
- 6.5. We may also share your personal data and special category personal data with other third parties for other reasons. For example to provide information to a regulator; or to otherwise comply with the law. For example, to comply with our legal obligations we may share your data with the DVLA/DVSA in the UK or the RSA in Ireland to validate driving licence information and the number of points on your licence if the job role you apply for involves you driving company vehicles.
- 6.6. We may obtain personal data and/or special category personal data about you from third party sources, such as recruitment agencies, job boards, recruitment assessment centres, social media, occupational health professionals and background check providers. Where we receive such information from these third parties, we will only use it in accordance with this notice.
- 6.7. In some cases, they will be acting as a controller of your personal data and therefore we advise you to read their privacy notice and/or data protection policy.

## **7. TRANSFERRING INFORMATION OUTSIDE THE EEA**

- 7.1. Your personal data may be used, stored or accessed by staff operating outside the EEA working for us, other members of our group or suppliers.
- 7.2. If we provide any personal data about you to such non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal data adequately. These measures may include the following, as permitted in Articles 45 and 46 of the General Data Protection Regulation:
  - In the case of US-based entities, entering into European Commission-approved standard contractual arrangements with them, or ensuring that they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or
  - In the case of entities based in other countries outside the EEA, entering into European Commission-approved standard contractual arrangements with them.
  - If you require further information about these protective measures, you can request it from the relevant Privacy Correspondent.

## **8. DATA STORAGE AND SECURITY**

- 8.1. Your personal data and special category personal data is stored in a variety of locations, including: electronically on our secure servers/in hardcopy form in access-restricted, locked filing cabinets.
- 8.2. We take appropriate technical and organisational security measures and have rules and procedures in place to guard against unauthorised access, improper use, alteration, disclosure and destruction and accidental loss of your personal data.
- 8.3. In addition, we limit access to your personal data to those who have a business need to know and they will only process your personal data on our instructions and subject to a duty of confidentiality.
- 8.4. We have put in place procedures to deal with any suspected or actual data security breach and will notify you and the Information Commissioner's Office ("ICO") in the UK or the Data Protection Commissioner in Ireland of a suspected breach where we are legally required to do so.

- 8.5. Whenever we propose using new technologies, or where processing is construed as 'high risk', we are obliged to carry out a Data Protection Impact Assessment which allows us to make sure appropriate security measures are always in place in relation to the processing of your personal data.

## **9. DATA RETENTION**

- 9.1. We keep your personal data and special category personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirement. Job applications and interview records of candidates will be retained for 12 months – unless following an unsuccessful application you specifically consent to us holding it for longer for the purpose of contacting you in the event that any similar jobs / roles become available from time to time.
- 9.2. When applying for a job with us, we compile and keep a file containing information about you which relates to your application for a job with us. Your information will be kept secure and will be used for the purposes of your job application.
- 9.3. If you are offered and you accept a job with us, your personal data will be transferred to a personnel file. Any hard copy personnel file will be kept in access-restricted, locked filing cabinets. The retention period varies according to the personal data that we hold about you and the role(s) for which you are applying, and your personal data will be permanently and securely deleted at the end of this retention period.
- 9.4. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use and retain such information without further notice to you, as it falls outside of the definition of personal data under the GDPR.

## **10. YOUR RIGHTS**

- 10.1. You may make a request for access to personal data and/or special category data that we hold about you at any time. This is known as a Subject Access Request. Such a request may be made verbally or in writing and we must respond within 1 month. We may ask you for further information to enable us to process your request. Please note that we are permitted to extend the 1 month time period for responding by an additional 2 months where in our view your request is complex or numerous in nature. We may also charge a reasonable fee based on administrative costs where in our view your request is manifestly unfounded, excessive or a request for further copies. Alternatively, we may refuse to comply with the request in such circumstances.
- 10.2. Under certain circumstances, by law you also have the right to request:
- 10.2.1. to have your personal data corrected where it is inaccurate;
  - 10.2.2. to have your personal data erased where it is no longer required. Provided that we do not have any continuing lawful reason to continue processing your personal data, we will make reasonable efforts to comply with your request;
  - 10.2.3. that your personal data be transferred to another person;
  - 10.2.4. to restrict the processing of your personal data where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending, or you require us to keep it in connection with legal proceedings; and
  - 10.2.5. to object to the processing of your personal data, where we rely on legitimate business interests as a lawful reason for the processing of your data. You also have the right to object where we are processing your personal data for direct marketing purposes. We have a duty to investigate the matter within a reasonable time and take action where it is deemed necessary. Except for the purposes for which we are sure we can continue

to process your personal data, we will temporarily stop processing your personal data in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.

- 10.3. The way we process your personal data and the legal basis on which we rely to process it may affect the extent to which these rights apply. If you would like to exercise any of these rights, please address them in writing to the Privacy Correspondent for the company and business to whom you have applied for a job whose details can be found in Schedule 1 to this Privacy Notice.
- 10.4. We may need to request specific information from you to help us to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.
- 10.5. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Privacy Correspondent for the company and business to whom you are applying as set out in Schedule 1 to this Privacy Notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If you withdraw your consent, our use of your personal data before your withdrawal is still lawful.
- 10.6. You may complain to a supervisory body if you are concerned about the way we have processed your personal data. In the UK this is the Information Commissioner's Office (<https://ico.org.uk/>) and in Ireland is the office of the Data Protection Commissioner (<https://www.dataprotection.ie/>).

## **11. QUESTIONS**

- 11.1. If you have any questions about any matter relating to data protection or the personal data and/or special category personal data that that we process about you, please the Privacy Correspondent for the company and business to whom you are applying as set out in Schedule 1 to this Privacy Notice.

## **12. CONTACT US**

- 12.1. A list of all of our Privacy Correspondents together with their contact details is set out in Schedule 1 to this Privacy Notice. Please direct any queries about this policy or about the way we process your personal data to the Privacy Correspondent for the company and business that you are applying to.

**SCHEDULE 1**

**Saint-Gobain UK Group Companies, Trading Names and Privacy Correspondents**

Company	Business	Privacy Correspondent	Contact Details
Saint-Gobain Building Distribution Limited	Bassetts Benchmark Building Supplies Blackpool Power Tools Build Aviator Calders & Grandidge Castle Wood Floors Ceramic Tile Distributors Chadwicks Frazer Gibbs & Dandy Ideal Bathrooms International Decorative Surfaces International Timber JP Corry Pasquill Swedecor	David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>
Jewson Limited	George Boyd Graham Jewson Jewson Tool Hire Matthew Charlton Minster Neville Lumb Priority Plumbing Priority Supplies Priority Interior Building Supplies Roger W Jones	David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>
Norman Limited		David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>
Domestic Heating Services (Wholesale) Limited	DHS	David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>
Saint-Gobain Building Distribution (ROI) Limited	PDM	David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>
Scotframe Limited		David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>
Scotframe Timber Engineering Limited		David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>
Val-U-Therm Limited		David Clark	<a href="mailto:dataprotection@sgbd.co.uk">dataprotection@sgbd.co.uk</a>

Company	Business	Privacy Correspondent	Contact Details
Saint-Gobain Glass (United Kingdom) Limited	Saint-Gobain Glass	Danielle Taylor	<a href="mailto:dataprotection.SGGlassUK@saint-gobain.com">dataprotection.SGGlassUK@saint-gobain.com</a>
	Glassolutions	Amarjit Sandhu	<a href="mailto:dataprotection.glassolutions@saint-gobain.com">dataprotection.glassolutions@saint-gobain.com</a>
	Gibbs & Dandy Glass	Amarjit Sandhu	<a href="mailto:dataprotection.glassolutions@saint-gobain.com">dataprotection.glassolutions@saint-gobain.com</a>
	Swisspacer	Amarjit Sandhu	<a href="mailto:dataprotection.glassolutions@saint-gobain.com">dataprotection.glassolutions@saint-gobain.com</a>
Saint-Gobain Vetrotech AG		Meltem Kartel	<a href="mailto:dataprotection.DelUK&amp;I@saint-gobain.com">dataprotection.DelUK&amp;I@saint-gobain.com</a>
Saint-Gobain High Performance Materials UK Limited	Saint-Gobain Abrasives	Catherine Roe	<a href="mailto:dataprotection.SGAUK@saint-gobain.com">dataprotection.SGAUK@saint-gobain.com</a>
	Saint-Gobain Performance Plastic Tygaflor	Jonathan Holden	<a href="mailto:dataprotection.sgppltygaflor@saint-gobain.com">dataprotection.sgppltygaflor@saint-gobain.com</a>
	Saint-Gobain Performance Plastics Corby	David Rogers	<a href="mailto:dataprotection.sgpplcorby@saint-gobain.com">dataprotection.sgpplcorby@saint-gobain.com</a>
	Saint-Gobain Industrial Ceramics	Nigel Hales	<a href="mailto:dataprotection.industrialceramics@saint-gobain.com">dataprotection.industrialceramics@saint-gobain.com</a>
Saint-Gobain Performance Plastics Rencol Limited		Robert Lockyer	<a href="mailto:dataprotection.rencol@saint-gobain.com">dataprotection.rencol@saint-gobain.com</a>
Saint-Gobain Construction Products UK Limited	British Gypsum	Paul Deacon	<a href="mailto:dataprotection.britishgypsum@saint-gobain.com">dataprotection.britishgypsum@saint-gobain.com</a>
	Saint-Gobain Formula	Keith Ratcliffe	<a href="mailto:dataprotection.sgformulauk@saint-gobain.com">dataprotection.sgformulauk@saint-gobain.com</a>
	Saint-Gobain Ecophon	Will Jones	<a href="mailto:dataprotection@ecophon.com">dataprotection@ecophon.com</a>
	Saint-Gobain Pam UK	Richard Wall	<a href="mailto:dataprotection.sgpamuk@saint-gobain.com">dataprotection.sgpamuk@saint-gobain.com</a>
	Saint-Gobain Weber	Denise Rolph	<a href="mailto:dataprotection@netweber.co.uk">dataprotection@netweber.co.uk</a>
	Ham Baker Pipelines	Richard Wall	<a href="mailto:dataprotection.sgpamuk@saint-gobain.com">dataprotection.sgpamuk@saint-gobain.com</a>
	Celotex	Liz Cramp	<a href="mailto:dataprotection@celotex.co.uk">dataprotection@celotex.co.uk</a>
BPB Limited		Alun Oxenham	<a href="mailto:dataprotection.DelUK&amp;I@saint-gobain.com">dataprotection.DelUK&amp;I@saint-gobain.com</a>
Artex Limited		Helen Tunnicliffe	<a href="mailto:Dataprotection.Artex@saint-gobain.com">Dataprotection.Artex@saint-gobain.com</a>
Saint-Gobain Isover UK Limited		Jonathan Fox	<a href="mailto:dataprotection.sgisoveruk@saint-gobain.com">dataprotection.sgisoveruk@saint-gobain.com</a>
Saint-Gobain Limited	General Delegation Finance Shared Service Centre HR & Payroll Shared Service Centre SGTS	Alun Oxenham	<a href="mailto:dataprotection.DelUK&amp;I@saint-gobain.com">dataprotection.DelUK&amp;I@saint-gobain.com</a>
Saint-Gobain Construction Products (Ireland) Limited		Paul Whelan	<a href="mailto:dataprotection.SGCPI@saint-gobain.com">dataprotection.SGCPI@saint-gobain.com</a>
Saint-Gobain Mining Limited		Paul Whelan	<a href="mailto:dataprotection.SGCPI@saint-gobain.com">dataprotection.SGCPI@saint-gobain.com</a>
Saint-Gobain Performance Plastics Ireland Limited		Margaret O'Sullivan	<a href="mailto:dataprotection.sgppli@saint-gobain.com">dataprotection.sgppli@saint-gobain.com</a>
Saint-Gobain Life Sciences Ireland Limited		Margaret O'Sullivan	<a href="mailto:dataprotection.sgppli@saint-gobain.com">dataprotection.sgppli@saint-gobain.com</a>