

## CANDIDATE DATA PRIVACY NOTICE

This Candidate Data Privacy Notice (**this Notice**) is intended to ensure that you are aware of what personal data Signify Ireland Technology Development Limited ("**Signify**", "**us**", "**we**" or "**our**") with a registered address at Alcantara (Block C) Bonham Quay, Galway, Ireland, holds in relation to you, and how we use that data as data controller.

Please read the following carefully to understand our use of your personal data.

### 1 SCOPE

This Privacy Notice applies to you because you are applying to work with us whether as an employee, agency worker, consultant, individual contractor or director. It also applies to third parties whose information you provide to us in connection with our relationship with you (for example, in respect of references). Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

It applies to all personal data collected, maintained, transmitted, stored, retained, or otherwise used (i.e. processed) by us regardless of the media on which that personal data is stored. We may update this Privacy Notice at any time and will notify you in writing of any changes.

**IMPORTANT:** where we receive your CV via a third party recruitment agency or a third level education institution (together "**Recruiter**"), we encourage you to read the relevant Recruiter's data protection notice to understand how your personal data is processed by such a Recruiter who is a data controller of your personal data independently of Signify.

### 2 WHAT IS PERSONAL DATA?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We have set out in the table in Clause 7 a list of the categories of your personal data that we may process. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 3 HOW DO WE COLLECT YOUR PERSONAL DATA

We collect personal data through the application, recruitment and onboarding process, either directly from you or sometimes from third party sources such as an assessment vendor, Recruiter, subscription service, an employment agency or publically available sources (e.g. LinkedIn). If your application is successful, we will also collect additional personal data in the course of job-related activities throughout the period of you working for us.

### 4 PURPOSE AND BASIS FOR PROCESSING

The personal data we collect, the basis of processing and the purposes of processing are detailed below.

Personal data	Basis of processing	Purpose of processing
During the recruitment process we obtain previous employment background, references from previous employers, record of interview/interview notes, selection and verification records, skills assessments	It is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.	The use of the data is required to enable us to assess your suitability for a role and to undertake the recruitment process.

<p>results and related notes and recordings, educational details, professional and/or academic transcripts, professional certifications, special skills including licenses, language skills, memberships of committees or other bodies, cover letters submitted, references, and any details provided in cover letters, and information on locations where you are legally authorised to work.</p>		
<p>Personnel administration data (name, private contact details including location, date of birth, data on education, professional experiences and qualifications (as provided during the application process), employment contract type, employment status, job level, and desired salary, certificates and diplomas, login details and IT system identifiers).</p>	<p>It is necessary for the performance of our contract with you, or to take steps for entering into our contract with you.</p>	<p>This is required to enable us to administer the contractual relationship with you, including the set-up of an electronic personnel file and administer benefits,</p>

## **5 SPECIAL CATEGORIES OF PERSONAL DATA**

We do not process special categories of personal data during the application phase such as physical or mental health or ethnic or racial origin.

We only process such data where necessary for the purpose of carrying out the obligations, and exercising specific rights, of Signify or of a prospective employee under employment law or for the assessment of your working capacity.

## **6 CONSENT**

In principle, we do not rely on your consent for data use. We may, however, from time to time, (i) ask for your consent to use your personal data for a specific purpose; and/or (ii) process your personal data (including "special data") in order to protect your vital interests or the interests of another. If we do so, we will provide you with full details of the data that we would like and the reason we need it. We will also inform you about the fact that you can revoke your consent at any time and how you should do that. 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.

## **7 WHERE YOU DO NOT PROVIDE US WITH YOUR PERSONAL DATA**

If you do not provide us with your personal data we may not be able to process your job application, or assess your suitability for a particular role, comply with our legal obligations or manage our business. We will tell you when we ask for information which is a statutory or contractual requirement or needed to comply with our legal obligations.

## **8 SECURITY AND STORAGE OF PERSONAL DATA**

We operate and use appropriate technical and physical security measures to protect your personal data. Third party processors will only process your personal data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those members of the HR Department, Employees, agents and other third parties who have a business need to know. They will only process your personal data 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.

## **9 RECIPIENTS OF YOUR PERSONAL DATA**

It may be necessary from time to time for us to disclose personal data to third parties or agents, including without limitation to the following:

- Third parties to assist in the administration, processing and management of certain activities pertaining to prospective employees, which assists Signify to administer human resources and employee compensation;
- Recruiters (where your application is being handled by a Recruiter);
- Individuals or companies employed by Signify to carry out specific services, functions or consultancy work including skills assessments, external reference agencies and other financial institutions;
- Relatives or legal representatives of prospective employees;
- Your previous employer(s)
- Regulatory bodies to whom we are obliged or required to disclose information including Workplace Relations Commission, Courts and Court-appointed persons;
- Potential purchasers or bidders;
- Relevant Government departments and agencies; and
- Other support service providers necessary to assist Signify with the above.

We will inform you in advance if we intend to further process or disclose your personal data for a purpose other than the purposes set out above. We take all reasonable steps, as required by law, to ensure the safety, privacy and integrity of such data and information and, where appropriate, enter into contracts with such third parties to protect the privacy and integrity of such data and any information supplied.

## **10 TRANSFER OF PERSONAL DATA OUTSIDE THE EEA**

We will transfer your personal data to the United States of America. Where we transfer your personal data outside of the EEA, we will ensure appropriate safeguards are in place to protect the privacy and integrity of such Data, including standard contractual clauses under GDPR Article 46.2 or adequacy decision under GDPR Article 45. Please see the 'Contact Us' section below if you wish to obtain information concerning such safeguards.

## **11 DATA RETENTION**

Where you are a **successful job applicant**, the Personal Data generated by us and provided by you over the course of the job application/recruitment process will be retained by us for the purpose of your contract of employment. Such personal data will be retained in accordance with our Employee Data Protection Notice (which will be available to you when you commence onboarding and employment).

Where you are an **unsuccessful job applicant**, we will retain your personal data for a period of up to 18 months from the most recent of the following events:

- You register online as a candidate or a Recruiter registers your details with us;
- Either you or a Recruiter on your behalf submit or withdraw an application;
- We advise you or a Recruiter on your behalf that your application has been unsuccessful; or
- You decline our offer of employment.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your personal data.

## **12 AUTOMATED DECISION MAKING/PROFILING**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## **13 YOUR DATA RIGHTS**

You have several rights in relation to your personal data. You have a right to:

- access a copy of your personal data held by Signify;
- request rectification of your personal data if it is inaccurate or incomplete;
- request erasure of your personal data in certain circumstances;
- restrict our use of your personal data in certain circumstances;
- move (or port) personal data which is automated in certain circumstances;
- object to the processing of your data where our legal basis for processing your data is our legitimate interests;
- not to be subject to a decision based on automated processing, including profiling which has legal or similar significant effects;
- withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal; and
- lodge a complaint with the Office of the Data Protection Commissioner (if you are unhappy with how your personal data is being handled).

However, these rights may not be exercised in certain circumstances, such as when the processing of your data is necessary to comply with a legal obligation or for the exercise or defence of legal claims. If you wish to exercise any of your rights in this regard please see the 'Contact Us' section below. We will respond to your request as soon as practicable. We may request proof of identification to verify

your request.

#### **14 YOUR RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

Without prejudice to any other administrative or judicial remedy you might have, you may have the right under data protection legislation in your country (where applicable) to lodge a complaint with the relevant data protection supervisory authority in your country (i.e. the Office of the Data Protection Commission in Ireland) if you consider that we have infringed applicable data protection legislation when processing your personal data. This means the country where you are habitually resident, where you work or where the alleged infringement took place.

The Irish Data Protection Commission contact details are:

##### **Data Protection Commission**

**Telephone:** +353 (0)761 104 800 or Lo Call Number 1890 252 231

**E-mail:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

For further information please visit [www.dataprotection.ie](http://www.dataprotection.ie)

#### **15 CHANGES TO OUR PRIVACY NOTICE**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

#### **16 CONTACT US**

Questions, comments and requests regarding this Privacy Notice and your personal data are welcome and should be addressed to us at the below email and/or postal address:

**Email:** [privacy@signifyhealth.com](mailto:privacy@signifyhealth.com)

**Address:** Alcantara (Block C) Bonham Quay, Galway, Ireland; Data Privacy and HR

**Last updated:** 4 March 2022