

AmeyBriggs Services Ltd and Briggs Equipment UK Limited

Recruitment Privacy Notice

This Recruitment Privacy Notice applies to all persons who apply for a job or another role with us. The term "applicants" is used in this Notice to refer to anyone who applies for a job role, or who otherwise seeks to carry out work with or for us (whether on a permanent or non-permanent basis). This Notice explains how we process and protect your personal data, including any information you submit to our online recruitment software and any information gathered on this website. We recommend that you read this Notice in full to ensure you are completely informed about how we collect, process, share and protect your personal data.

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1. OVERVIEW

1.1. We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. As such your data is securely stored and only accessed by relevant and authorised personnel.

1.2. The purpose of the data collection and the type of data requested is decided by the Data Controller. In this instance, the Data Controller is either: Briggs Equipment UK Limited of Orbital 7 Orbital Way, Cannock, Staffordshire, WS11 8XW, or AmeyBriggs Services Ltd of Chancery Exchange, 10 Furnival Street, London, England, EC4A 1AB (together "**Briggs**"). The Data Protection Officer for Briggs can be contacted at: DPO@Briggsequipment.co.uk for Briggs Equipment UK Limited or DPOservices@fieldfisher.com for AmeyBriggs Services Ltd.

1.3. The Data Controller uses a Data Processor in order to collect, store and securely transfer your data. In this instance your Data Processor is:

Talos360 Limited,
4 Webster Court,
Carina Park,
Warrington,
WA5 8WD.

The Data Protection Officer for Talos360 can be contacted at: dpo@talos360.co.uk

1.4. Please address any questions or requests relating to this Notice to dpo@talos360.co.uk or alternatively, you can raise any concerns with your line

manager or local HR department or local Data Protection Officer (DPO) if you have one.

2. DATA SECURITY

- 2.1. The technology that we use has been designed with your security in mind. Our Data Processor's servers are based in the United Kingdom and European Union, deploying both technological and operational security measures, along with internal policies specifically implemented to protect your data.
- 2.2 Candidate data is encrypted uniquely at rest to AES256-bit standards. In transit, data is also encrypted to the same standard over TLS v1.2.
- 2.3 Briggs sub-processors ensure data security is aligned to NIST standard framework, have been duly audited to ISO27001:2022 standard, and data is stored within SOC2 certified environment.
- 2.4 Briggs sub-processors ensure data is protected with industry leading malware protection technology, including endpoint EDR, network IPS, and 24/7 monitoring.
- 2.5 Briggs sub-processors have vulnerability management processes in place that align to industry standards and must undertake regular vulnerability scanning, penetration testing and resolve any high or critical findings without undue delay.
- 2.6 The systems used by Brigg to process your personal data have rigid access controls in place to ensure that access to data is kept to minimal business requirements.
- 2.7 The system used by Briggs to process your data operate resilience through active failover and replication over multiple sites, ensuring data accessibility and recovery is always possible.

3. WHAT DATA DO WE COLLECT?

3.1. Information we collect automatically:

You can visit the recruitment section of our website <https://www.briggsequipment.co.uk/about-us/briggs-careers/> ("**Website**") and search for jobs without providing personal information. However, we do collect certain information automatically from your device when you visit our Website. For further information, please see the privacy notice that applies to the use of our Website <https://www.briggsequipment.co.uk/legal/privacy-policy/>.

3.2. Personal information collected from you:

In the course of your recruitment process, the initial information about you is likely to come from you directly: for example, contact details and information on your immigration status and whether you can lawfully work. We may also require references and information to carry out background checks.

3.3. Personal information collected from other sources:

In the course of your recruitment process, we may receive personal data relating to you from others, including from recruitment agencies, academic institutions, referees, background checking agencies and other third parties.

3.4. Categories of personal data:

Data categories	Personal data description	Source
Identification data and contact details	Your name, address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)).	Directly from you
Employment history	Previous employers and job titles/positions	Directly from you Third parties
Background information	Academic/professional qualifications, job qualifications, education, details included in your CV/résumé (which might include details of any memberships or interests constituting sensitive personal information), transcripts and employment references.	Directly from you Third parties
Details of your nominated referees	Their name, contact details, employer and job role.	Directly from you
Details of your immigration/visa status.		
Previous applications/roles	Information relating to previous applications you have made to the Briggs Group and/or any previous employment history with the Briggs Group).	Directly from you
Other information you voluntarily provide	As provided throughout the process, including through assessment centres / exercises and interviews.	Directly from you
References from referees	Information relating to your previous job experience	Third parties
Criminal records data	Information provided by criminal records checks.	Third parties

Information from background checking agencies and other external database holders	For example, credit reference agencies and professional / other sanctions registries	Third parties
Information collected from publicly available sources , including any social media platforms you use or other information available online.	Information made available on these sources.	Third parties

3.5. Sensitive personal information:

As a general rule, during the recruitment process, we try not to collect or process any of the following: information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health/sex life ("**Sensitive Personal Information**"), unless authorised by law or where necessary to comply with applicable laws.

However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role. You may provide, on a voluntary basis, other Sensitive Personal Information during the recruitment process.

4. PURPOSES FOR PROCESSING PERSONAL DATA AND LEGAL BASIS

4.1. We use the personal data that we collect from and about you for a variety of recruitment-related purposes described in this Notice or for purposes that we explain to you at the time we collect your information.

4.2. The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

Purpose/Activity	Type of personal data	Lawful basis <i>See table below for lawful basis descriptions</i>
Administering your application	Identification data and contact details. Employment history. Background information. Details of your immigration/visa status. Previous applications/roles	<ul style="list-style-type: none"> • Performance of a contract with you • Legal obligation • Legitimate interests

Assessing your skills and qualifications	Employment history. Background information. Previous applications/roles.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests
Verifying information on your application	References from referees. Information from background checking agencies and other external database holders. Information collected from publicly available sources, including any social media platforms you use or other information available online.	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests
Carrying out reference checks or background checks	References from referees. Criminal records data. Information from background checking agencies and other external database holders.	<ul style="list-style-type: none"> • Legitimate interests
Contacting you or others on your behalf	Identification data and contact details.	<ul style="list-style-type: none"> • Legitimate interests
Monitoring of diversity and equal opportunities	Background information. Sensitive Personal Data.	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations • Employment obligations • Substantial public interest
Supply you with relevant job alerts	Identification data and contact details.	<ul style="list-style-type: none"> • Legitimate interests
Analysed for our internal statistics	Identification data and contact details. Employment history. Background information. Details of your immigration/visa status. Previous applications/roles. References from referees. Criminal records data. Information from background checking agencies and other external database holders. Sensitive Personal Data.	<ul style="list-style-type: none"> • Legitimate interests

If you are not successful, we may still keep your application to allow us to consider you for other suitable openings within Briggs in the future unless you request that we delete your application.

- 4.3. Depending on our purpose for collecting your information, we rely on one of the lawful bases described in the table below (i.e. legally permitted reasons under GDPR/UK GDPR).
 - 4.3.1. our legitimate interest (as summarised above) (which are not overridden by your data protection interests or fundamental rights and freedoms, particularly taking into consideration the safeguards that we put in place);
 - 4.3.2. to comply with applicable immigration and/or employment laws and regulations;
 - 4.3.3. to take steps prior to entering an employment contract with you, where you are considered for employment;
 - 4.3.4. in circumstances where you have made the data public;
 - 4.3.5. where we have your consent to do so. If we require your explicit consent to process any data as specified by the UK GDPR, we will inform you of this requirement and request your explicit “opt-in” at the point of data entry; and
 - 4.3.6. to protect the rights and interests of the Briggs Group, our employees, applicants and others, as required and permitted by applicable law.
- 4.4. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).
- 4.5. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided above.

5. YOUR DATA ACCESS RIGHTS

- 5.1. When it comes to your personal data you have the right to:
 - Rectify inaccurate or outdated information;
 - Request to move your personal data (data portability);
 - Object to personal data processing;
 - Request to restrict processing of your personal data;
 - If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent;
 - Ask for a copy of your personal data via a Subject Access Request (SAR); and
 - Lodge a complaint with the UK’s Information Commissioner’s Office (ICO) or other relevant data protection authority about our collection and use of your personal

information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries are available [here](#).)

To exercise any of these rights, please contact dpo@talos360.co.uk. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

- 5.2. If you believe there are inaccuracies in your personal data, let us know, and we will amend your records. You can also review the personal data you have provided to this website by contacting dpo@talos360.co.uk.
- 5.3. To request deletion your personal data, please submit your request [here](#) , and we'll delete your records.
- 5.4. The Data Controller or Data Processor may use automated decision making to assess your eligibility for a job and screen applications. Examples would be to screen for the right to work in the UK or if the ability to drive a vehicle is required for a particular role, to screen for suitable driving licence. You have the right to obtain human intervention, to express your point of view and to obtain an explanation of any such decision and challenge it. Please contact dpo@talos360.co.uk if you are concerned about such decisions or to exercise your rights.
- 5.5. If you are not satisfied with the way your personal data has been processed, you can submit a case to our internal complaints procedure by contacting dpo@talos360.co.uk. If the outcome is unsatisfactory, you have the right to contact the ICO (<http://www.ico.org.uk>).

6. SHARING DATA

- 6.1. We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.
- 6.2. We will share your personal information with other members of the Briggs Group around the world in order to administer our recruitment processes and store data.
- 6.3. Sometimes certain information may be processed on our behalf by relevant third parties; this includes but is not limited to: video interviewing companies, payroll software, and HR software.
- 6.4. We may also disclose personal information to third parties on other lawful grounds, including:
 - Where you have provided your consent;

- In some cases, we may be compelled or permitted by law, an official authority, or regulatory requirements to process your personal information without your consent or knowledge, even after you have exercised your right to withdraw, be forgotten, or object to processing. If this happens, we will only process the limited personal data required under these specific circumstances;
- As necessary to establish, exercise or defend against potential, threatened or actual legal claims;
- Where necessary to protect your vital interests or those of another person; and/or
- In connection with the sale, assignment or other transfer of all or part of our business.

6.5. In some cases, the sharing described above may result in your personal information being transferred internationally, including from the European Economic Area to a country outside it. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

6.6. Specifically, some of our third party service providers operate around the world. This means that when we collect your personal information, we may process it in any of these countries.

6.7. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Notice.

7. LENGTH OF DATA STORAGE

7.1. Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally, this means your personal information will be retained:

- in accordance with the retention periods set out in the Briggs' Employee Privacy Notice <https://www.briggsequipment.co.uk/legal/privacy-policy/> (where you become our employee); or
- for a period of two (2) years after the last action on your candidate account, either a progression for the application or application for another role. After this period, your account will be deactivated and your personal data deleted. You can also request to withdraw your details at any time and thereafter your data will be fully anonymised for further protection.

8. PRIVACY NOTICE CHANGES

8.1. We reserve the right to update this Notice at any time in response to changing legal, regulatory, technical or business developments, and we will provide you with a new privacy notice when we make any substantial changes. We encourage you to check back at this website periodically in order to be aware of the most recent version of this Notice. We may also notify you in other ways from time to time about the processing of your personal data.

8.2. You can see when this Notice was last updated by checking the “last updated” date displayed at the top of this Notice.