

Last updated: 9 September 2024

RECRUITMENT PRIVACY NOTICE

SCANIA (GREAT BRITAIN) LIMITED SCANIA FINANCE GREAT BRITAIN LIMITED MAN FINANCIAL SERVICES UK LIMITED

1. INTRODUCTION

Scania (Great Britain) Limited, Scania Finance Great Britain Limited and MAN Financial Services UK Limited are committed to protecting and respecting your privacy. Please see the end of this Privacy Notice for our contact and legal information.

This Privacy Notice describes the personal information we collect about you for recruitment purposes, including when you apply for a job or register for future vacancies with us. It also explains what we do with that information, how we keep it safe and how you can exercise your data protection rights. This Privacy Notice does not contain any contractual terms and does not form part of any offer of employment.

When you apply for a role or register your interest for future vacancies with Scania (Great Britain) Limited, Scania Finance Great Britain Limited or MAN Financial Services UK Limited the company to whom you apply or with whom you register is the controller of the processing of your personal information. A controller is the company that decides why and how your personal information is processed, including how it is collected and used.

Where this Privacy Notice refers to “we”, “our” or “us” below, unless it mentions otherwise, it is referring to company to whom you have applied for a job, whether Scania (Great Britain) Limited, Scania Finance Great Britain Limited or MAN Financial Services UK. Please note that, if applying through a third party jobs portal, a separate privacy policy made available to you by the operator of that portal will apply to its use of your personal information.

We take your privacy seriously and we are fully committed to protecting your personal information at all times. We will only process your personal information in accordance with, and adhere to the principles set out in UK data protection and privacy laws.

2. THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

We collect personal information about you when you apply for a job vacancy and during the recruitment process. We also collect your personal information when you register for future vacancies.

We may collect, store and use personal information about you which includes some, or all, of the following:

- Name, home address, work address and contact information including telephone numbers and email addresses.
- Date and place of birth.
- Driving licence number.
- A list of any relevant training and qualifications pertinent to the role for which you are applying.

- Your CV and covering letter.
- An indication that you are permitted to work in UK.
- Your salary and working hour expectations.
- Your current package and benefits.
- In some circumstances we may ask you to answer some competency questions in relation to the role for which you are applying.
- Details of why you have applied for the role.
- Any details about your health which you provide regarding adjustments or accessibility assistance needs you may have so you can be supported through the application process.
- Video interview recordings.
- Telephone interview recordings.
- Application documentation (including interview and assessment centre notes).
- Employment references.
- Passport, driving licence and other identity information and visa documentation.
- Results of verification checks we perform including those relating to your work history, qualifications and right to work.
- Your image and vehicle registration number in CCTV footage.
- Equality monitoring information (including information about your gender, ethnicity, religion and sexual orientation) but only where you choose to provide this to us.
- For certain roles, the results of any criminal backgrounds checks we conduct.

3. HOW AND WHY WE PROCESS YOUR PERSONAL INFORMATION

The law allows us to collect and process your personal information in certain circumstances. The circumstances in which we may process your personal information for recruitment purposes are:

To carry out steps at your request prior to entering into a CONTRACT with us

We process your personal information as necessary to perform any steps you expressly request in connection with your job application and any subsequent offer of employment.

With your CONSENT

We process your personal information where we have obtained your consent, including for the purposes of holding your details for use in future applications. See further '*How long we keep your information*' below.

You can withdraw your consent at any time by contacting us using the details at the end of this Privacy Notice. The use of your information that we make before you withdraw your consent will remain lawful.

Where we have a LEGAL OBLIGATION

We may process your personal information where it is necessary for us to comply with our legal obligations, including:

- To formally identify you by processing formal identification documentation relating to you, such as a passport or driving licence, to verify your identity (including your date of birth);
- To check your eligibility to work in the UK, as required by immigration laws, by processing passport, visa and other relevant documentation;

- To comply with court processes and court orders by processing information in relation to legal claims made by you or against you;
- For purposes relating to the occurrence, investigation or prevention of fraud where required by law; and
- To perform DVLA checks to validate driving licence information if the job role you apply for involves you driving company vehicles.

Where it is in ours, or someone else's, LEGITIMATE INTEREST

We may collect and use your personal information where there is a legitimate business reason to do so and where we consider that doing so will not materially impact your rights, freedoms or interests. We process your personal information on this basis for the following legitimate interests and purposes:

Processing necessary for us to operate the recruitment process efficiently and effectively

- To communicate with you in relation to the recruitment process;
- To analyse, evaluate and report on vacancy recruitment;
- To enable the distribution and organisation of requests such as pre-employment checks and management of job offers;
- To progress the application through the recruitment process;
- To assess your suitability for a job vacancy you are applying for;
- To help determine whether a job offer may be made to you;

Processing necessary for us to protect our staff, property and business

- For security and health and safety reasons in order to protect our staff, property and business (including through the use of CCTV operating at our business premises);
- To verify the information you provide to us in your application.

The purposes for which we use your personal information mentioned above include using the following information in the following ways:

- 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, any education history, employment records, professional qualifications and certifications in order for us to consider your suitability for the job you are applying for;
- details of the job role you are applying for, any interview notes made by us during or following an interview with you, in order to assess your suitability for that role;
- details of any psychometric testing which we ask you to undertake will be retained by us in accordance with our legitimate interest to assess your suitability for a vacancy;
- pay and benefit discussions with you to help determine whether a job offer may be made to you;

- 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;
- CCTV footage of you onsite at any of our office and data centre locations. These systems may record your image and number plate during your visit. We do this on the basis of our legitimate interest to protect our customers, premises, staff and assets from crime; and
- network and information security data in order for us to take steps to protect your information against loss, theft or unauthorised access.

We will only process your personal information 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence or work history), we will not be able to process your application successfully. For example, if we require references for a role and you fail to provide us with relevant details, we will not be able to take your application further.

4. OUR USE OF YOUR SENSITIVE PERSONAL INFORMATION

Your 'special category' personal information

There are "special categories" of more sensitive personal information which are more private in nature and therefore require a higher level of protection, such as genetic data, biometric data, sexual orientation, race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and health. In limited circumstances, where you have provided it, we will also collect, store and use your special category personal information on the basis set out below:

- To enable us to perform our legal obligations in respect of employment law. This may include health information to assess and/or to comply with our obligations under the Equality Act 2010 (for example a requirement to make reasonable adjustments to your working conditions);
- Where processing is necessary for reasons of substantial public interest, in accordance with any legislation that we are subject to, proportionate to the aim pursued and respectful of your rights to data protection and with suitable measures in place to safeguard your rights and freedoms. This includes processing to identify or monitor equality of opportunity or treatment between different groups of applicant, where those groups are based on special categories of data; or
- Where processing is necessary for the 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 and, where you are successful in your role application, carrying out any medical assessment required for your role, pension and any insurance benefits.

Information about your criminal convictions

We do not routinely process information about criminal convictions. However, for applications for certain roles, we undertake Disclosure and Barring Service (DBS) checks or equivalent for the relevant territory where we have a legal right and reason for doing so.

Where we do so, we only do so in accordance with the principles in applicable data protection laws, and the most recent legislation in the area of criminal backgrounds checks.

5. AUTOMATED DECISIONS

We do not envisage that any decisions will be taken about you using automated means where these have a significant impact on you or have legal implications for you. However we will notify you in writing if this position changes.

6. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We understand that your privacy is important and that you trust us to look after your personal information. We will never sell your personal information.

Our group companies

We may share your Information with other companies within our corporate group, the Scania Group, for statistical, analytical, audit or administration purposes and we will anonymise your personal information wherever appropriate before it is shared.

Our suppliers

We may share your personal information with our suppliers i.e. third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us (or directly to you) on our behalf.

We take steps to ensure that our suppliers comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated data sets wherever possible.

The key suppliers we use and personal information we share with them are as follows:

Category of personal information	Recipient/relationship to us	Purpose of disclosure
All personal information collected	IT service providers	To support, maintain and host our information systems, including the software and hardware infrastructure required for it to operate/be accessible online and to keep a backup of your personal information. We also use online IT service providers to provide contract execution services

All personal information collected	Our legal and other professional advisers (including accounting and audit services)	To provide us with advice in relation to our business, including our legal, financial and other obligations and claims
Contact details and government issued ID	Background check providers	To ensure the safety and security of the workforce
Your contact details and any relevant disability or health data	Occupation health providers	To provide you with any adjustments required to attend our assessments and interviews
Your contact details	Providers of assessment and testing services	To provide you with access to our assessments which form part of our recruitment process
Your contact details and government issued ID	Providers of immigration and right to work advice	To understand whether you require any work permits or visas in order to complete the job role to which you have applied
All personal information collected	Interview/minute taking companies	To keep an accurate record of your interviews in order to assess your suitability for the job role to which you have applied

Other third parties

We may also share your personal information if we're under a duty to disclose or share it in order to comply with our legal obligations, to detect or report a crime, to comply with our tax obligations or to protect the rights, property or safety of our staff and customers. In these circumstances, your personal information may be shared with the police, HMRC, DVLA or other public bodies.

We may obtain personal information about you from third party sources, such as recruitment agencies and job boards. Where we receive such information from these third parties, we will only use it in accordance with this Recruitment Privacy Notice. In some cases, they will be acting as a controller of your personal information and therefore we advise you to read their privacy notice.

7. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

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 personal information will be kept secure and will be used for the purposes of your job application. We will hold your personal information for no longer than 12 months from the date of application.

Unless one of the exceptions below applies, your personal information will either be deleted completely or anonymised.. If we anonymise your personal information (so that it can no longer be associated with you), it falls outside of the definition of personal information under UK data protection laws, and we may use such information without further notice to you.

The only exceptions to the period mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- where you have raised a legal claim, complaint or concern about the recruitment process us, in which case we will retain your information for a period of 6 years following the date of that legal claim, complaint or query, whichever is the later, in order for us to manage, deal with and/or defend any such legal claim, complaint or query;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- you are employed by us following your application (see further below);
- we have stated a different period for a particular type of role in a supplementary privacy notice; or
- we give you the option to consent to us holding your personal information for a further 12 months so we can consider you for future roles and you give your consent. You are free to withdraw that consent at any time and we will delete or anonymise your personal information. If you apply for a new role with us after consenting for us to hold your personal information, your personal information will be dealt with as if you have submitted a new application and we then rely on our legitimate interests to hold your personal information for 12 months following application.

If you are offered and you accept a job with us, your personal information will be transferred to a personnel file. Any hard copy personnel file will be kept in access-restricted, locked filing cabinets. The period for which we keep your personal information varies depending on the role(s) which you have held during your employment with us, and your personal information will be permanently and securely deleted at the end of this period. You will be provided with a separate privacy notice which provides details of our use and handling of your personal information if you are employed as a member of Scania staff.

8. WHERE WE HOLD YOUR PERSONAL INFORMATION

There may be some instances where your information is processed or stored outside of the UK. Those countries may not have similar data protection laws to the UK and so may not protect the use of your personal information to the same standard.

In those instances, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Notice. These steps include imposing contractual obligations on the recipient of your personal information using standard clauses issued by the UK Information Commissioner's Office (or other relevant body) and relying on decisions issued by the relevant UK Secretary of State (or other relevant person) declaring that a recipient or country is adequately protective of personal information to a degree that allows us to safely transfer your personal information to that recipient or country. This includes any international

frameworks that allow recipients to certify that they can receive your personal information safely and process it in a manner that is protected to an equivalent standard as that under UK law.

Please contact us using the details at the end of this Privacy Notice for more information about the protections that we put in place and to obtain a copy of the relevant documents.

If you use our services whilst you are outside the UK, your information may be transferred outside the UK in order to receive those services.

9. HOW WE KEEP YOUR PERSONAL INFORMATION SAFE

Your personal information is stored in a variety of locations, including electronically on our secure servers and in hard copy form in access-restricted, locked filing cabinets.

We and the companies within the Scania Group all use technical and organisational security measures to protect the personal information supplied by you and managed by us against accidental loss, destruction and unauthorised access by third parties. Our security measures are continually improved in line with technological developments. Whenever we propose using new technologies, or where processing is construed as 'high risk', we are obliged to carry out a risk assessment which allows us to make sure appropriate security measures are always in place in relation to the processing of your personal information.

We limit access to your personal information to those who have a need to know and they will only process your personal information on our instructions and will be under a duty of confidentiality to us.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information whilst in transit to our website and any transmission is at your own risk. We have put in place procedures to deal with any suspected or actual data security breach and will notify you and the relevant data protection regulator of a suspected breach, where we are legally required to do so.

Where we have given (or where you have chosen) a password which enables you to access IT systems, you are responsible for keeping this password confidential. We ask you not to use the same password as on other accounts and not to share your password with anyone.

10. WHAT ARE MY RIGHTS OVER MY PERSONAL INFORMATION?

You have the right to request a copy of the personal information we hold, which is known as a 'data subject access request'.

Under certain circumstances, by law you also have the right to:

- have your personal information corrected where it is inaccurate;
- have your personal information erased where it is no longer required. Provided that we do not have any continuing lawful reason to continue processing your personal information, we will make reasonable efforts to comply with your request;

- have your personal information be transferred to another person in an appropriate format where we process that personal information in reliance on your consent or to perform a contract (or your requested pre-contractual steps) and the processing is carried out by automated means;
- withdraw your consent to processing of your personal information where we rely on consent to process that information;
- restrict the processing of your personal information 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
- to object to the processing of your personal information, where we rely on our legitimate interests as the lawful reason for processing your information or in relation to use of your information for the purposes of direct marketing.

We have a duty to investigate the matter within a reasonable time and take action where necessary. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information 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 information for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your personal information.

We must respond to any request raised within 1 month under UK data protection laws and are permitted to extend this by an additional 2 months where your request is complex or if we have received several requests from you. We may also charge a reasonable fee based on administrative costs where in our view your request is manifestly unfounded or excessive or a request for further copies. Alternatively, we may refuse to comply with the request in such circumstances. We may require you to provide copies of your identification documents to verify your identity, where appropriate. If we choose not to action any request from you, we will explain to you the reasons for our refusal.

To make a request in accordance with any of your rights, please contact GDPR@scania.com.

We encourage you to ensure that the personal information that we hold about you for the purposes of your application or for the purposes of considering you for any similar roles is accurate and up to date by keeping us informed of any changes to your personal information. You can update your details by contacting GDPR@scania.com.

11. CONTACTING THE REGULATOR

We encourage you to get in touch with us directly in the event of any query or complaint at GDPR@scania.com, or by calling 01908 210 210 and asking for the Legal and Compliance team, and we will do all we can to resolve any issue you may have. However, if you feel that your personal information has not been handled correctly you have the right to lodge a complaint with the Information Commissioner's Office, the UK data protection regulator. You can contact them by calling 0303 123 1113.

12. CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice was last updated on the date that appears at the top of the notice. We may review this Privacy Notice from time to time and any changes will be notified to you by posting an updated version on our website. Any changes will take effect 7 days after the date we post the modified terms online. We recommend you regularly check for changes and review this Privacy Notice when you visit our website.

13. CONTACT US

If you have any questions about the processing of your personal information or wish to contact us to amend/update your personal information, please contact us by email at sgb.recruitment@scania.com.

If you wish to complain about the use of your personal information or request a copy of the personal information we hold about you, please contact GDPR@scania.com or call 01908 210 210 and ask for the Legal and Compliance Team.

Legal and Compliance Team
Delaware Drive
Tongwell,
Milton Keynes
MK15 8HB

For legal details about our companies, please see:

Scania (Great Britain) Limited - <https://www.scania.com/uk/en/home/admin/misc/legal.html>

Scania Finance (Great Britain) Limited – <https://www.scania.com/uk-finance/en/home/admin/misc/legal.html>

MAN Financial Services UK Limited - <https://www.financialservices.man.eu/uk/en/>