

REVANTAGE GLOBAL SERVICES UK LTD AND REVANTAGE REAL ESTATE LTD
RECRUITMENT PRIVACY NOTICE

July 2022

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# REVANTAGE GLOBAL SERVICES/REVANTAGE REAL ESTATE ("REVANTAGE UK") RECRUITMENT PRIVACY NOTICE

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**Data controller(s):** In this Recruitment Privacy Notice, "Revantage UK" means the entity where you have applied for an employee position.

**Data protection contact for this notice:** Vice President, People & Culture <a href="mailto:uk\_peopleandculture@revantage.eu/">uk\_peopleandculture@revantage.eu/</a> Vice President, Legal & Compliance dataprivacy@revantage.eu

Revantage UK collects and processes personal data during the recruitment process. Revantage UK is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

For the purposes of the UK GDPR, Revantage UK is the data controller of the personal data it collects and processes about you, meaning that Revantage UK is responsible for deciding the purposes and the means by which your personal data is processed.

This Recruitment Privacy Notice explains how and why we may process your personal data as a candidate for a role at Revantage UK and your rights in relation to this.

## 1. What information does Revantage UK collect?

Revantage UK collects and processes a range of information about you from the time we receive your application for a role, whether submitted by you or an agent on your behalf. This might include:

- your name, address, and contact details, including email address and telephone number, date of birth and gender
- · a profile photograph
- employment information including that contained in your application, covering letter, CV, and any other information you provide as part of your initial application

- details of your qualifications, skills, experience, your professional memberships and/or certifications, and employment history, including start and end dates, with previous employers
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover
- any specific skills relevant to the role you have applied for, for example any language skills
- · information about your marital status, next of kin, dependants, and emergency contacts
- information about your nationality, citizenship, and entitlement to work in the UK
- information about your willingness to relocate, current salary information, notice period, results of any tests taken as part of our recruitment process (for example, psychometric tests), notes and feedback of test assessors or interviewers
- information about any criminal record (further details in relation to processing would be specifically provided to you at the relevant time it was collected/used)
- information about medical or health conditions, including whether you have a disability for which Revantage UK needs to make reasonable adjustments
- · details of trade union membership, where applicable
- equal opportunities and diversity monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

Revantage UK collects this information in a variety of ways. For example, data is collected through application forms, CVs or resumes; obtained from any official documents you provide to certify your identity; from correspondence with you; or through interviews, meetings, or other assessments.

## 2. Why does Revantage UK process personal data?

Revantage UK needs to process your personal information for the purposes of identifying you, assessing your application for the role in question, and as you progress through the recruitment process, assessing your skill set, experience and suitability, and if applicable, your eligibility for the role you have applied for. We may also need to process your personal data to decide whether to enter into a contract with you.

Revantage UK does this on the basis of our legitimate interest, that being the need to identify the most appropriate individuals for the role. Where Revantage UK relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by your individual rights and freedoms and has concluded that they are not. Certain activities described in this Privacy Notice are undertaken on the basis that it is necessary for the purpose of taking steps at your request, to enter into a contract with Revantage UK, e.g., for relevant background checks and where applicable any disability adjustments where we have made an offer of employment to you that you wish to accept.

Some of the personal data that we process about you is classed as 'special category' data. This is personal data that needs more protection because it is sensitive. In the context of the recruitment process, this may include data about your health and/or if you have a criminal record.

Revantage UK may process your health data to fulfil its employment law obligations (such as to make any necessary adjustments for prospective employees with disabilities and for health and safety purposes).

As noted above, Revantage UK may, should it choose, conduct appropriate criminal records checks and process criminal records data to assess suitability for employment. Should this occur, you will be notified of this at the time of the checks and asked to complete the necessary forms and authorisations.

Diversity is important to Revantage UK. You can choose whether you wish to provide Revantage UK with your 'protected characteristics' (gender, ethnic origin, sexual orientation, religion, disability, and age), for the purpose of Revantage UK's Diversity, Equality and Inclusion (DE&I) monitoring and policy development. There are no consequences to you personally should you choose not to provide it. Should you choose to provide it, it will be processed on the basis that it is necessary for Revantage UK to comply with its diversity legal obligations as an employer/ prospective employer.

Should you choose to provide your 'protected characteristics', this may be viewed by limited authorised members of Revantage UK's People and Culture Team to prepare statistical reports so relevant senior management can monitor performance of and develop DE&I policy to promote equality of opportunity.

#### 3. Who is data shared with?

Your information will be shared internally, according to the relevant needs, including with members of the People & Culture team, the team you intend to join, and IT staff if access to the data is necessary for performance of their roles.

Revantage UK may also share it with its selected recruitment partners to the extent needed to administer the recruitment process, and your details may be shared with and used by them to produce analytics to help formulate Revantage UK's recruitment strategy.

Revantage UK may share your personal data with other third parties, including other Revantage group companies (who it engages to help it run its business) and other Blackstone Group companies.

Your information may be used to obtain pre-employment references from other employers, obtain employment background checks from third party providers, obtain necessary criminal records checks from the Disclosure and Barring Service, or report suspected offences to the appropriate authorities.

Revantage UK may also share your data with third parties in the context of a sale of some, or all, of its business.

Appropriate contractual and confidentiality obligations will be put in place with third parties to protect your information.

Your data may be transferred by Revantage UK and its business partners to countries outside the UK and the European Economic Area to countries that do not have equivalent data protection laws to that granted in the UK and the European Union. Any personal data transfer to such third parties will, depending on the nature of the transfer: be covered by appropriate safeguards such as standard contractual clauses approved by the European Commission or the UK government.

#### 4. How does Revantage UK protect data?

Revantage UK takes the security of your data seriously. Revantage UK has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by relevant employees in the performance of their duties.

Where Revantage UK engages third parties to process personal data on its behalf, they do so based on written instructions, and the third parties are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

#### 5. For how long does Revantage UK keep data?

If you are unsuccessful with your application on this occasion, or if you are successful but withdraw or turn down our offer, then we will keep your personal data for 12 months in case another role arises for which we think you would be a good match. You can ask for it not to be retained for this purpose, or to delete your data earlier than this 12-month deadline but we would not be able to contact you if a role did arise. If you wish to delete your data, please send an email to dataprivacy@revantage.eu. Please note, if you make such a request, it will be necessary to retain certain application information in order, where required, for Revantage UK to demonstrate compliance with its legal obligations relevant to recruitment, for example, diversity.

If you are successful on this occasion and become an employee, your personal data will transfer to your employee file and will be subject to a separate employee privacy policy, which will be made available to you at the relevant time.

## 6. Your rights

As a data subject, you have several rights. You can:

- access and obtain a copy of your data on request
- require Revantage UK to change incorrect or incomplete data
- require Revantage UK to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where Revantage UK is relying on its legitimate interests as the legal ground for processing
- ask Revantage UK to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override Revantage UK's legitimate grounds for processing data

If you would like to exercise any of these rights, please contact Jovana Marovic via email at dataprivacy@revantage.eu.

If you believe that Revantage UK has not complied with your data protection rights, you can complain to the Information Commissioner.

## 7. What if you do not provide personal data?

If you choose not to, or fail to provide the information we request, we may not be able to perform the necessary assessments that form part of the recruitment process and as such we may not be able to progress your application.

## 8. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. Revantage UK does not currently make employment decisions based solely on automated decision-making.

#### 9. Contacts

People & Culture	uk_peopleandculture@revantage.eu
Data Team	dataprivacy@revantage.eu

PREVIOUS POLICY REVIEWS: 19 July 2022

**NEXT REVIEW DATE: 19 July 2023** 

Policy owner(s):

People & Culture - Revantage UK

Legal & Compliance – Revantage UK