

Revision History

Revision Date	Version	Description of Revision	Responsible person
March 2019	1.0	Initial document created	Amit Kumar
September 2024	2.0	Update to incorporate review and simplification	Kenneth Ko

Recruitment Fair Processing Notice

The information you provide will be handled securely and only used for the Purposes described in this Recruitment Fair Processing Notice.

1. Fair Processing Notice – Recruitment

- 1.1. Tata Steel UK Limited and its associated companies (“Tata Steel”, “we”, “our” or “us”) collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations under the UK General Data Protection Legislation (“UK GDPR”) and other data protection legislation.

2. Personal Data collected

- 2.1. We may collect a range of personal data about you in order to consider your application for employment. This includes:
 - 2.1.1. Your name, address, contact details, including email address and telephone number;
 - 2.1.2. Details of your qualifications, skills, experience and employment history;
 - 2.1.3. Information about your current level of remuneration, including benefit entitlements;
 - 2.1.4. Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
 - 2.1.5. Information about your entitlement to work in the UK;
 - 2.1.6. Any unspent criminal convictions covered under the Rehabilitation of Offenders Act 1974; and
 - 2.1.7. Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
- 2.2. We collect this data in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including tests.
- 2.3. We may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and, subject to applicable law, information from criminal record checks. We will seek information from third parties only once a job offer has been made to you and we will inform you that we are seeking such information.
- 2.4. Data will be stored in a range of different place, including on your application record, in our HR management systems and on other IT systems (including email).

3. Purposes for processing personal data

- 3.1. We need to process personal data to take steps at your request prior to entering into a contract with you. We also need to process data so that we may enter into a contract with you.
- 3.2. In some cases, we need to process data to ensure that we are complying with legal obligations. For example, we are required to check a successful applicant’s eligibility to work in the UK before employment starts.
- 3.3. We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm an applicant’s suitability for employment and to decide to

whom employment should be offered. We may also need to process data from job applicants to respond to and defend legal claims.

- 3.4. We process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and to exercise specific rights in relation to employment. Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes as permitted by the Data Protection Act 2018. For some roles, we are obligated to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary to carry out obligations and exercise specific rights in relation to employment/comply with a regulatory requirement to establish whether a job applicant has committed an unlawful act or been involved in dishonesty or other improper conduct.
- 3.5. We will use your data for processing your application in line with our recruitment process, and the information will be kept in line with our data retention schedule.

4. Access to data

- 4.1. Your data will be shared internally for the purposes of the recruitment exercise on a need to know basis. This may include members of the HR team, Occupational Health, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their role.
- 4.2. We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We may then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks, subject to applicable law.
- 4.3. While some processing activities may be undertaken by subprocessors of Tata Steel who are based in India and may access your data from India, your data will be stored in servers located in the UK and/or the EU. Where required by applicable data protection laws, Tata Steel will ensure that suitable safeguards are in place to protect your personal information and that transfer of your personal information is in compliance with applicable data protection laws.

5. Data retention period

- 5.1. Your personal data will be kept by us for the following durations:

- 5.1.1. Application records and associated files (including CVs, letters, emails, comment and feedback) will be anonymised 2 years after the vacancy is archived.
- 5.1.2. Candidate account - you can, at any time, choose to close your account. This will:
 - 5.1.2.1. remove your ability to login to the account;
 - 5.1.2.2. withdraw any active applications;
 - 5.1.2.3. delete partially-completed applications which haven't been submitted; and
 - 5.1.2.4. disable the automatic sending of job alerts.
- 5.1.3. Closed accounts are deleted and cannot be restored. Previously submitted applications will be retained until deletion for the period described above.
- 5.1.4. Candidate accounts that are active will remain in the system unless the candidate deletes them (or makes a request for deletion). An account will become inactive if the user has not logged in for two years. All inactive accounts will be anonymised for deletion.

6. Protection of data

- 6.1. We take your data protection rights and our legal obligations seriously. Your personal data will be treated in a secure and confidential manner. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and not accessed except by our employees in the proper performance of their duties.

- 6.2. If your application for employment is successful and you accept a role offered to you, personal data gathered during the recruitment process will be transferred to your personal file and retained during your employment. A separate Fair Processing Notice relevant to employee data will apply to you.

7. Your rights

- 7.1. As a data subject, you have a number of rights. You can:

- 7.1.1. Access and obtain a copy of your data on request;
- 7.1.2. Require us to change incorrect or incomplete data;
- 7.1.3. Require us to delete or stop processing your data (for example, where the data is no longer necessary for the purposes of the processing);
- 7.1.4. Object to the processing of your data where we are relying upon our legitimate interests as the legal ground for processing; and
- 7.1.5. Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate interests for processing data.

- 7.2. You also have the right to lodge a complaint with a supervisory authority, in particular with the Information Commissioner's Office in the UK, if you consider that the processing of your personal information infringes applicable law.

- 7.3. For further information regarding your rights, or to exercise any of your rights, please contact dataprivacy@tatasteleurope.com

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