

## **Three Careers Privacy Policy**

This privacy policy explains how we use the personal information we collect about you when you use this website.

If you register on the website (jobs.three.co.uk) and provide us with personal information, we will process your personal information on the basis set out below.

References to “Three, us or we” in this Privacy Policy mean Hutchison 3G UK Limited

### **1. Three’s Commitment**

Three respects your rights to privacy and we are committed to complying with applicable data protection and privacy law. We will only collect information about you with your awareness and in line with our legal obligations. Any personal information which you provide to us and/or which we obtain will be kept secure and confidential using appropriate technical measures and ensuring staff are trained and aware of how to protect your data.

### **2. Changes to our Privacy Policy**

We keep our privacy policy under regular review, and we place any updates on this page. This policy was last updated on 18<sup>th</sup> March 2022.

### **3. Personal information we collect**

We collect different types of information from or about you.

First, let’s clear up what we mean by “personal information”. This has a specific legal definition, but it really means anything that identifies you personally or could be used to identify you personally.

Other information we collect won’t be considered “personal information” e.g. your gender alone. This is “non-personal data” because you cannot be identified personally from this information.

The following information is collected upon application. Some of these details are mandatory to include in your application

<b>Key Fields</b>	<b>Sub Fields</b>
<b>Personal Information</b>	Title
	First Name
	Last Name
	Personal email address
	Contact phone number
	Address
	Gender

	Date of birth
	UK national insurance number
<b>Salary/hourly rate and notice period</b>	Current salary or hourly rate
	Salary or hourly rate
	Notice period
<b>Other</b>	Source tracking (where did you hear about us?)
	CV/Resume
	Any supporting documents (e.g. covering letter, academic qualifications)
	Assessment performance information

You will also need to agree to our Privacy, Equal Opportunities and Declaration statements.

We may also capture information about your right to work in the UK, any criminal convictions and offences.

Pre-employment checks, for example security and financial checks, may also be carried out depending on the role.

Later in the recruitment process, we will store interview/assessment notes should you be interviewed/assessed by Three. We will also capture your right to work documentation as part of the recruitment process.

#### **4. Where we collect personal information from?**

We have set out below all the places where we obtain your information.

##### **Data you give to us**

- The personal information you provide us directly when you apply for a role with us such as information included in CVs, application forms, application tests or cover letters.

##### **Data from outside organisations**

We may also collect personal information about you from the following;

- Recruitment Agencies
- Pre employment check providers
- Social networks
- Websites
- Former employers or referrals

## **5. How and why we use your personal information?**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Legal Obligations – where we need to comply with a legal obligation.
- Legitimate Interests – where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.
- Necessary to enter into a contract with you – where it is necessary in order to take steps at your request prior to entering into a contract of employment, or other contract to provide services, with you.
- Where we collect special purposes data e.g. health related information, we will obtain your permission before processing or/and sharing.
- Where we need to protect your vital interests (or someone else's interests).

We have set out below why we will use your personal information and our legal reason for using your personal information:

<b>Why we will use your personal information</b>	
Identifying candidates for potential employment, as well as for future roles that may become available.	Legitimate Interests
Making a decision about your recruitment or appointment.	Legitimate Interests
Determining the terms on which you work for us.	Legitimate Interests
Checking you are legally entitled to work in the UK.	Legal Obligations
To prevent fraud.	Legitimate Interests
Conducting pre-employment screening checks.	Legitimate Interests
Equal opportunities monitoring.	Legal Obligations

Complying with legal or regulatory obligations placed on us with regard to our hiring, such as those relating to candidates with disabilities.	Legal Obligations
Dealing with legal disputes involving you and protecting our legal rights to the extent authorised or permitted by law.	Legal Obligations
Complying with health and safety obligations.	Legal Obligations
Record keeping in relation to our recruitment processes.	Legitimate Interests

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## **6. Who we share your personal information with**

We will only share your personal information with third parties for the purposes of processing your application. Third parties may include:

- Other entities within the CK Holdings group.
- Taleo (our talent management software application)
- TalentBrew (software which runs our careers site)
- Cut-e (our online assessment platform)
- Psychological Consultancy Ltd, (our psychometric Hogan Assessments)
- Project People (Master vendor)
- Randstad (Preferred external recruitment agency)
- Former employers, for the purposes of obtaining references from you.
- Health management (our Occupational health provider)

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

## **7. How we protect and secure your information**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents,

contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and where they are subject to a duty of confidentiality.

## **8. How long we keep your information**

We process your personal information for no longer than is necessary for the purpose(s) for which it was collected.

The storage periods relevant to your personal information are as follow:

- Records are held on the database for 12 months from the last time of logging in. After this time, they are no longer searchable.
- Records are held for a total of 18 months, from the last time of logging in, for reporting purposes after which your information will be deleted.

We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information.

If your application with us is successful, the personal information gathered during the recruitment process will be transferred to your HR file and retained during your working relationship with us. The periods for which your personal information will be held will be communicated to you in our privacy notice for employees, workers and contractors.

## **9. Your data protection rights**

You have several rights in relation to the personal information we collect from or about you, including the right:

- Request access to your personal information (commonly known as a "Data Subject Access Request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. You can do this directly by clicking [here](#) to view your applications.
- Request that we erase personal information you have given to us (although please note that in some cases we will be permitted to retain your personal information under applicable law – we will notify you if that is the case).
- Request that our use of your personal information be restricted (although please note that in some cases we will be permitted to retain your personal information under applicable law –we will notify you if that is the case).

- Request a copy of the personal information you have given to us, which we will send in a commonly used, and machine-readable format e.g. CSV file.
- To object to your personal information being processed on the basis of legitimate interests (see section entitled 'How and why we use your personal information') where you consider that such interests are overridden by your own particular interests.
- Not to be subject to a decision based solely on automated processing (including profiling) which produces a legal effect concerning you or significantly affects you.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you request access or deletion of your personal information, we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Our contact details**

If you have any questions about our privacy policy or wish to exercise your rights, you can contact us using the details below:

By email - [Jobs@three.co.uk](mailto:Jobs@three.co.uk)

Or write to us at: Resourcing Team, Hutchison 3G UK Limited, 450 Longwater Avenue, Green Park, Reading, Berkshire, RG2 6GF.

Website: [Jobs.three.co.uk](http://Jobs.three.co.uk)

### **How to contact the Regulator**

You have the right to report any concern in relation to our information rights practices to the Information Commissioner's Office. To learn more, please visit <https://ico.org.uk/make-a-complaint/> or call their helpline on 0303 123 1113.