

THIS PRIVACY NOTICE APPLIES IF YOU ARE CONSIDERING APPLYING FOR A STAFF POSITION IN OR AS A CONTRACTOR TO THE SOPRA STERIA GROUP OF COMPANIES,

- **Sopra Steria Limited**
- **Sopra Steria Recruitment Limited**
- **NHS Shared Business Services Limited**
- **Shared Services Connected Limited.**

This Privacy Notice is supplemental to Sopra Steria's Privacy Notice available at <https://www.soprasteria.co.uk/footer/privacy-policy>

PURPOSE OF AND JUSTIFICATION FOR PROCESSING YOUR PERSONAL DATA.

1 REGISTRATION – PROCESSING ON THE BASIS OF OUR LEGITIMATE INTERESTS AND TO TAKE STEPS FOR THE FORMATION OF A CONTRACT

Your information is being processed for the purposes of resourcing the personnel requirements of Sopra Steria Limited and other companies in the Sopra Steria UK Group (Sopra Steria Recruitment Limited, Shared Services Connected Limited and NHS Shared Business Services Limited).

The information we keep includes your CV (where you have provided this) and answers to on-line questionnaires. This information enables us to assess your work related capabilities, experience and location and determine if you would be a suitable candidate for our requirements. Where a potential match is determined the contact information we hold also allows us to get in touch with you to discuss this.

We will not use your data for the purposes of automated decision making, including profiling, without first informing you of this.

During the registration stage, we are processing your data on the basis of our legitimate interests in fulfilling our staffing requirements and in order to take steps to enter into a contract under which you will provide services to us.

2 INTERVIEW – PROCESSING ON THE BASIS OF YOUR CONSENT, OUR LEGITIMATE INTERESTS AND TO TAKE STEPS FOR THE FORMATION OF A CONTRACT

Once we select you for interview we will use your personal data to contact you and/or your Personal Services Company or chosen Umbrella Company to arrange it. If we offer expenses we will also ask you for your bank information for the purposes of reimbursement. We will also take account of any request you make for special arrangements – e.g. for access or dietary requirements.

At the stage of interview and thereafter we will be processing your personal information on the basis of one or more of the following:

- Your consent
- for the purposes of taking steps performing a contract for the provision of your services to us; and
- for compliance with legal obligations on us (such as, for example, Health and Safety)

- for our legitimate interests (such as, for example, site security).

We may also process your personal data where allowed by law, for example, to protect your vital interests.

3 **OFFER AND ENGAGEMENT – PROCESSING FOR THE PURPOSES OF PERFORMING A CONTRACT WITH YOU**

If you are offered and accept a position with us we will process your personal data on the basis of our internal Privacy Policy, which will be available to you upon engagement.

If you are unsuccessful in obtaining a position we may require to continue to hold and process your personal data for the following purposes:

- To comply with legal obligations on us
- Under our legitimate interest in continuing to hold your data in case other opportunities become available

And we may periodically ask you to update your personal data where this is the case.

CATEGORIES OF PERSONAL DATA

1 **REGISTRATION**

In order to make the assessments referred to under **Registration** above, and to contact you, we need to hold and process personal data as defined under the General Data Protection Regulation. This data may include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Current work location(s)
- Photograph (optional)

And we will hold the results of the assessments.

Special Category Data

We do not ask for or need data which is considered under the General Data Protection Act as Special Category Data to match you against our personnel requirements. This category includes data such as

- your racial or ethnic origin,
- your political opinions,
- your religious beliefs or other beliefs of a similar nature,
- whether you are a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- your physical or mental health or condition,
- your sexual life,
- the commission or alleged commission by you of any offence, or

- any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

Should you choose to provide any of the above Special Category Data (eg on your CV) this will be retained on your original correspondence, but (apart from photographs) it will not be recorded elsewhere on our systems and will not be used as the basis for any assessment of your suitability. It may however be used at later stages, as described below.

Diversity

Please note that any diversity surveys we undertake are not mandatory and the answers given will not form part of your record, but stored in a completely anonymised manner through which you cannot be identified. This anonymisation means it falls outside of the GDPR as it cannot be related back to you.

2 INTERVIEW AND SELECTION

If you are selected for interview there may be a requirement to provide further personal data, without which your application will not be able to proceed. This may include, but is not limited to

- information contained in documents produced as evidence of your right to work in the UK,
- proof of identity,
- proof of address.

If we make and you accept an offer we will ask you for

- National Insurance Number,
- Date of birth
- Other information requested on a personal information form

and we will process any financial or criminal checks required by your role.

3 ENGAGEMENT

If you accept an offer are engaged as an employee or contractor the personal data we may process is listed in our internal Privacy Notice.

Your rights in respect of such processing are set out in those documents and reflect those listed below under '**RIGHTS**'.

RECIPIENTS

1 REGISTRATION

When you register with us your personal data will only be processed via

- our group internal systems provided by Sopra Steria Groupe SA on behalf of all its subsidiaries including Sopra Steria Ltd.

All this processing takes place either in the EU or under contract between Sopra Steria Groupe and the relevant provider, which incorporates the required safeguards

- our Indian affiliate Steria India Pte Ltd,

with whom we have a Data Transfer Agreement incorporating the Model Clauses approved by EEC Commission Decision 2010/593 as providing an adequate level of protection for your personal information.

2 INTERVIEW AND SELECTION

During the Interview and Selection process we may also need to share your personal data with third parties, including but not limited to:

- Your referees, and agencies who hold that information on your behalf
- Vetting and similar agencies.

3 ENGAGEMENT

If you are engaged as an Employee or contractor our internal Privacy Notice will apply. We will also process your personal information for compliance with legal obligations on us (such as, for example, making statutory returns to HMRC).

RETENTION

If you are unsuccessful in obtaining a position or do not accept an offer we will retain your information until six months have elapsed since our last contact with you and then ask for your consent to retain it for longer.

If you do not wish us to continue to hold your personal data you may request us to delete it at any time by emailing uk_recruitmentadmins@suprasteria.com or writing to us at Sopra Steria Limited, 1010 Winnersh Triangle, Winnersh Triangle, Berks RG41 5TS.

RIGHTS

You can, at any time, request

- confirmation that we are processing your personal data,
- access to your data,
- rectification of your data,
- erasure of your data,
- restriction of processing of your data or raise an objection to such processing,
- to transfer your data to another controller.
- Information about the existence of automated decision-making, including profiling, and, where relevant
 - meaningful information about the logic involved,
 - the significance and the envisaged consequences of such processing.

You can contact us regarding any of these rights at dpo.uk@soprasteria.com or the address at the end of this Notice.

SOURCES

The personal data referred to in this Privacy Notice may be obtained from

- Job boards to which you have posted your Personal Data
- A directly submitted CV
- Referees
- Social or professional media platforms
- Vetting and other third party agencies.

STATUTORY OR CONTRACTUAL REQUIREMENTS OR OBLIGATIONS

At the point of registration there is no obligation to provide information.

If submitted for a role or placed there may be a requirement for you to provide further information, without which your application or placement will not be able to proceed. This information may include, but is not limited to

- right to work in the UK,
- proof of identity,
- proof of address,
- proof of any special qualifications required for the role,
- National Insurance Number,
- the report certificate from any financial or criminal checks required.

AUTOMATED DECISION MAKING

We do not use any automated decision making. We may use computer based professional capability assessments from which a score is recorded. You are not obliged to take these assessments.

ENQUIRIES AND COMPLAINTS

Any enquiry or complaint about how your interview or application has been handled should be emailed to uk_recruitmentadmins@suprasteria.com or sent in writing to Sopra Steria Limited, 1010 Winnersh Triangle, Winnersh Triangle, Berks RG41 5TS.

If you have any enquiry or complaint related to how we hold or process your personal data we would very much like to hear directly from you.

Any enquiry or complaint about our use of your personal data should be emailed to dpo.uk@soprasteria.com or sent in writing to Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH.

You also have the right to complain directly to the Information Commissioner's Office (ICO).

The ICO can be contacted on their helpline, 0303 123 1113, or through their website at <https://ico.org.uk/concerns/>

25 May 2018