

INTY – JOB APPLICANT PRIVACY NOTICE

Last modified: **February 2021**

This Privacy Notice describes how intY, a ScanSource company (“intY”, “ScanSource”, “we” or “us”) collects and uses the personal data of job applicants in connection with recruitment by intY (“Applicants”).

Personal data we collect about you

We collect and use personal data about Applicants which may include the following:

- **Personal details and characteristics** including your name, contact information (address, telephone number and email), date of birth, passport number and country of issuance, nationality, place of birth, national ID numbers (including, for example, UK national insurance number), previous employment details, current and historical compensation information, and CCTV footage.
- **Information contained in your CV** including occupational details, current job title, current job description, previous employment details, training and qualifications, education details.

We do not collect your sensitive personal data unless we are required or permitted to do so by applicable law, or you have, in accordance with applicable law, provided your explicit consent to the collection and processing of your sensitive personal data. Sensitive personal data may include information relating to disability or criminal convictions and offences.

You are required to provide certain personal data to intY so that we may consider your application. If you fail to provide any personal data that is required we may be unable to continue evaluating your application.

How we use your personal data

We use the personal data that we collect, subject to applicable law, for the following purposes:

- **Recruitment:** managing and administering the recruitment process, carrying out background checks, making travel arrangements, making offers to successful applicants, and staff onboarding. We process personal data for these purposes on the basis that it is necessary for our legitimate interests in managing and administering our business and recruiting staff.
- **Legal and compliance:** compliance with legal and other requirements such as immigration, record-keeping and reporting obligations, reviewing HR processes, responding to legal process such as subpoenas and court orders, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, conducting investigations and complying with internal policies and procedures. We process personal data for these purposes on the basis that we are required to do so by law or it is necessary for the establishment, exercise or defence of legal claims.
- **Communications, facilities and emergencies:** facilitating communications with you, protecting the health and safety of anyone visiting our premises, and safeguarding office equipment, facilities and other property. We process personal data for these purposes on the basis that it is necessary for our legitimate interests in managing and administering our business, and administering, maintaining and ensuring the security of our IT systems and premises

- **Sensitive information:** We may also collect certain types of sensitive personal data for specific purposes, including the collection of health or medical information for accessibility and 'fit for work' purposes, and information relating to criminal background checks. We do not collect your sensitive personal data unless we are required or permitted to do so by applicable law, or you have, in accordance with applicable law, provided your explicit consent.

Data sharing and transfer

We may share your personal data with ScanSource, Inc. and its affiliates for the purposes described in this Notice.

We may share personal data with service providers that perform services on our behalf such as payment service providers, analytics providers, and hosting providers. In accordance with applicable law, we have entered into legally binding agreements requiring them to use or disclose personal data only as necessary to perform services on our behalf or comply with applicable legal requirements.

In addition, we may disclose personal data about you (a) if we are required or permitted to do so by law or legal process, for example due to a court order or a request from a law enforcement agency, (b) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (c) in connection with an investigation of suspected or actual fraudulent or other illegal activity, and (d) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

Data Transfers

We may transfer the personal data that we collect about you to recipients in countries other than the country in which the personal data originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the personal data. When we transfer your personal data to recipients in other countries (such as the U.S.), we will protect that personal data as described in this Notice.

If you are located in the European Economic Area ("EEA"), we will comply with applicable legal requirements providing adequate protection for the transfer of personal data to recipients in countries outside of the EEA and Switzerland. In all such cases, we will only transfer your personal data if:

- The country to which the personal data will be transferred has been granted a European Commission adequacy decision; or
- The recipient of the personal data is located in the U.S. and has certified to the EU-U.S. Privacy Shield Framework; or
- We have put in place appropriate safeguards in respect of the transfer, for example the EU Model Clauses.

You may request a copy of the safeguards that we have put in place in respect of transfers of personal data by contacting us as described in the How to Contact Us section below.

How we protect your personal data

We maintain appropriate technical and organisational measures designed to protect your personal data against loss or accidental, unlawful or unauthorised, alteration, access, disclosure or use.

Data retention

Your personal data is retained for the duration of our relevant recruitment processes and as long as necessary thereafter to fulfil the purposes described above. Retention periods may

be extended if you agree that we may retain your information to inform you about future opportunities with ScanSource, if we are required to preserve your personal data in connection with litigation, investigations and proceedings, or if a longer retention period is required or permitted by applicable law.

Your rights and choices

Subject to applicable law, you may have the right to request:

- confirmation of whether we process personal data relating to you and, if so, to request a copy of that personal data;
- that we rectify or update your personal data that is inaccurate, incomplete or outdated;
- that we erase your personal data in certain circumstances, such as where we collected personal data on the basis of your consent and you withdraw that consent, or when you object to use of your personal data;
- that we restrict the use of your personal data in certain circumstances, such as while we consider another request that you have submitted, for example a request that we update your personal data;
- withdrawal of your consent where you have given us consent to process your personal data; and
- that we provide a copy of your personal data to you in a structured, commonly used and machine readable format in certain circumstances.

If you wish to exercise any of your data protection rights or if you consider that we have processed your personal data in violation of applicable law, please contact us as detailed in the “How to Contact Us” section below.

If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

How to Contact Us

If you have any questions about this policy, or you would like to exercise any of your rights, please let us know by contacting us using any of the methods below:

By phone to: HR Director at +44 (0)1454 640591

By email at: humanresources@inty.com

In writing at: HR Director, 170 Aztec West, Bristol BA32 4TN