

Colt Candidate Privacy Statement

1. Introduction

Colt Technology Services Ltd (“Colt” or “Colt group”) collect and handle the personal data contained in your job application. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). This Privacy Notice makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, how long it will usually be retained for and the rights that may be available to you

You may provide your personal data directly to us by applying to a position through the Colt careers [page](#) or through third party agencies or job boards to which you have provided your explicit consent to share your personal data with third parties (employers like us).

Colt is committed to providing candidates with the highest standards of Data Protection, thus your personal data will be treated in line with applicable data protection laws, including without limitation the Regulation (EU) 2016/679 (General Data Protection Regulation – ‘GDPR’) and the UK GDPR.

2. Categories of personal data and purposes

Colt is handling the following the personal data (i.e. data which can be used to identify you) for the purposes described underneath:

What data?

Why?

<u>Login credentials:</u> email address and password.	For you to create an account at Colt online recruiting system to apply for a position.
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<u>Contact Details:</u> name, surname, email and telephone.	To be able to be contacted by Colt for recruitment related activities which include setting up and conducting interviews. Also, with your consent, send you information about positions within the Colt group which may be of interest to you.
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<u>Location:</u> country/region of residence and personal address.	To determine if location is suitable on the basis of working model of the position (e.g. partly remote).
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<u>Professional and employment related information:</u> information contained in your resume or CV, other documents related to the application or recruitment process (e.g. cover letter, transcripts, certifications, licenses), job history (e.g. previous employment, roles) and citizenship or immigration information (e.g. for visa purposes, right to work information).	To assess and evaluate your skills, qualifications and interests against the position applied for and/or other positions within the Colt group and ensure that you are the right candidate for the job role. To comply with immigration authority regulations and requests.
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<u>Educational information:</u> CV, Cover letter, certifications, education information, previous employment information, etc.	
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<u>Picture/Images/Voice:</u> if you choose to submit a video.	
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3. Legal basis

We must have a legal basis to process your personal data. The legal basis we rely on are the following:

- (a) To comply with our contract obligations to you or to take steps to enter into a contract with you.
- (b) To comply with our legal obligations with Labour and/or Immigration local Authorities.
- (c) With your consent, to send you information about positions within the Colt group which may be of your interest.
- (d) To meet our legitimate interests, which are the solicitation, evaluation, and selection of applicants for employment.

4. Data Protection Rights

If you wish to exercise your rights of access, rectification, erasure, restriction, portability or objection regarding the profiling of Personal Data, please send an email to HRContactCentre@colt.net together with a document that can identify you, attaching the form related to the right you wish to exercise available at www.colt.net/gdpr/.

We encourage you to contact us to update or correct your information if it changes or if the personal data we hold about you is inaccurate.

Additionally, you are able to lodge a complaint to the competent data protection authority. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them, for such purpose please send an email to HRContactCentre@colt.net.

5. Automated decisions about you

Please be informed that the processing of your personal data at the first or review stage of the recruitment process may involve to profile and score your skills through an Artificial Intelligence tool for the purpose of helping the Talent Acquisition Team to find the best candidates based solely on your skills.

The system scans and sources profiles from external databases based on the contextual intelligence of the job descriptions. It uses machine learning to match CVs and job specifications. The personal data is anonymized until the moment the recruiter shortlists your profile. At that moment your personal data will be used for recruitment related activities as contacting you for setting up an interview. Please note that, therefore, the profiling is use to avoid any biases like gender, racial and aligned with diversity objectives.

Subject to local legal requirements and limitations, you can object to our automated decision-making (exercising objection right as described in section 4) and request an automated decision to be reviewed by a human being – a member of our Talent Acquisition team.

6. Recipients

Colt may share your personal data with third parties in limited situations, including with:

- **Colt group companies:** We may share your personal data with other companies that fall within the Colt group, for example for recruitment purposes, human resource management and internal reporting.
- **Service providers and business partners:** We may share your personal data with our service providers and business partners that perform recruitment operations for us. For example, we may partner with other companies to host the recruitment system and analyse data.

- **Law enforcement agency, court, regulator, tax authority, government authority or other third party:** We may share your personal data with these parties if necessary to comply with a legal or regulatory obligation.

7. International data transfers

Your personal data will be hosted within the EEA and UK, however access to the personal data may be global. Colt may transfer personal data or makes personal data accessible to its subsidiaries (<https://www.colt.net/legal/>), subcontractors or otherwise located within or outside of the EEA or UK for the provision of the services. Colt transfers the Personal Data in compliance with Data Protection Laws and with EDPB Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data. The transfers within Colt Group are carried out by means of its Binding Corporate Rules (BCRs). The transfers outside of Colt Group are carried out on the basis of an adequacy decision of the European Union or, failing that, on the basis of appropriate safeguards as the Standard contractual Clauses and, where applicable, supplementary security measures.

In the case of Japanese citizens personal data, corresponding agreements are executed with data importers in compliance with the Japanese Act on Protection of Personal Information (APPI).

8. Retention periods

Your personal data will be retained by Colt as long as it determines it is necessary to evaluate your application for employment, but no more than a year, unless in the meantime, you provide Colt with a new updated CV or information or you agree to keep such information within a longer period.

9. Contact details

If you have any questions about the present document, please feel free to contact Colt via email at gdpr@colt.net, which is the email address of our Global Data Protection team, or via post at Colt Technology Services Group Limited at Colt House | 20 Great Eastern Street | London | EC2A 3EH | UK.

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