

# Colt Candidate Privacy Notice

## 1. Introduction

Colt Technology Services Group Limited and the [Colt Group of companies](#) ("Colt" or "Colt group", "we", "us" or "our") 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 under applicable data protection laws.

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 (i.e., 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 – the "EU GDPR") and the UK's implementation of the EU GDPR (the "UK GDPR") (collectively, the "GDPR").

Colt is the Controller (as defined in the GDPR) for the purposes of the processing of your personal data described in this Privacy Notice.

## 2. Categories of personal data, purposes and legal bases

We must have a legal basis to process your personal data (i.e. data which can be used to identify you) . The legal bases we rely on are the following:

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

Colt is handling the following the personal data for the purposes, and under the legal bases, described below:

**What data?**

**Why?**

**Legal basis**

Login credentials:  
address password.

email

For you to create an account at Contractual Necessity Colt online recruiting system to apply for a position.

Contact Details: name, surname, email telephone.

To be able to be contacted by Colt for recruitment related activities which include setting up and conducting interviews.

Contractual Necessity

Consent

Sending you information about positions within the Colt group which may be of interest to you.

Location: country/region of residence personal address.

Legitimate Interests

To determine if your location is suitable in relation to the working model of the position (e.g. partly remote).

Professional and employment-related information: information contained in your resume or position CV, other documents related to applied for and/or other the application or recruitment group process (e.g. cover letter, transcripts, certifications, licenses), job history (e.g. previous employment, roles), citizenship or immigration

To assess and evaluate your skills, qualifications and interests against the positions within the Colt and ensure that you are the right candidate for the job role.

Legitimate Interests

information (e.g. for visa purposes, right to work information), and information necessary to complete background checks.

To comply with immigration authority regulations and requests

Legal Obligation

Images/Voice: if you choose to submit an image, video, or application in its entirety. audio.

To assess and evaluate your

Legitimate Interests

## Certificate of Disability

To comply with local regulations: Compliance with Anti-Discrimination Laws, Verification of Eligibility for Benefits, Promotion of Equal Opportunity, Legal Protection for Employers, Facilitation of Workplace Accommodations and Tax and Social Security purposes.

## Legal Obligation

### 3. 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 [askhrcolt@neocasemail.com](mailto:askhrcolt@neocasemail.com) together with a document that can identify you, attaching the form related to the right you wish to exercise available at <https://www.colt.net/legal/data-privacy/individual-rights/>.

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 [askhrcolt@neocasemail.com](mailto:askhrcolt@neocasemail.com).

### 4. 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, such as contacting you for setting up an interview. Therefore, the profiling is used to avoid any biases in Colt's recruitment processes (e.g., those relating to gender or race) and aligned with Colt's diversity objectives.

Subject to local law requirements and limitations, you can object to our automated decision-making (i.e., by exercising your right of objection, as described above in section 3) and request an automated decision to be reviewed by a human being – this will be a member of our Talent Acquisition team.

### 5. 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, or conduct background checks and other screenings.

- **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.

## 6. International data transfers

Your personal data will be hosted within the EEA and UK. However, access to the personal data may be global. Specifically, Colt may transfer personal data or makes personal data accessible throughout the Colt group, to subcontractors or to other recipients described in section 5 above, who are located within or outside of the EEA or UK for the provision of the services.

Colt transfers the personal data in compliance with applicable data protection laws. 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 EU or UK adequacy decision or, failing that, on the basis of appropriate safeguards (e.g., the EU’s Standard Contractual Clauses or the UK’s International Data Transfer Addendum) 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”).

## 7. 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, from which point Colt may retain your personal data for a further year; or
- you agree to keep such information within a longer period.

## 8. Contact details

If you have any questions about the present document, please feel free to contact Colt via email at [gdpr@colt.net](mailto: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.

## 9. Data Protection Officer

Colt has appointed a Group Data Protection Officer, Alessandro Galtieri, who you can contact using the contact details set out in section 8 above.

*Updated on June 2025*