

Privacy Policy

Introduction

Viberoptix OpCo Limited (known as Viberoptix) are a Tier 1 Contractor, providing a full turn key solution for the design, build and installation of fibre broadband networks.

The scope of this policy

This policy applies to the personal information we use in connection with recruitment activity for roles at Viberoptix.

The Data Controller

The controller of your personal information is the company to whom you register your interest or apply to for work, i.e. Viberoptix.

If you are successful in gaining work with Viberoptix, we may retain your personal information throughout your employment relationship with us.

Changes to this policy

This policy may change from time to time so it's a good idea to come back and read through it every now and then. If there's a significant change to the policy, we'll let you know.

What kind of information is collected, when and how

We typically collect your personal information directly from you through our website, our job portal, through job advertisements or a recruitment agency. We may sometimes be required to collect additional information from third parties or other publicly available sources. We will take reasonable steps to inform you we collect your personal information from a third party, such as refer friend schemes.

What personal information do we collect?

We collect, store, and use your personal information throughout the recruitment process where necessary. We collect various types of data at different stages of the recruitment process.

Initial application details include:

- Name
- Contact details
- Address and Postcode
- Qualifications, skills and experience
- Immigration status
- Diversity information such as race/ethnic origin, religion or disabilities
- Any relevant reasonable adjustments required as part of the process; which means for example allowing for different type of disabilities or difficulties
- Remuneration expectations
- Criminal convictions
- Those extra details that you choose to share with us
- Extra details your referees choose to tell us or we receive from others

During the shortlisting and selection process we may also collect, store and use additional information such as:

- Driving licence
- Psychometric or situational judgement test/profile information
- Recorded video through our video interview tool
- Date of birth
- Photograph
- Survey response feedback for the purposes of service quality

- Emergency contacts

If you are successful in being offered a role with Viberoptix we will collect, store and use the following further information necessary to on-board as an employee into our business:

- Banking and Tax information
- Nationality
- Passport or equivalent identity card
- Financial information (where financial background checks are required)
- Remuneration details
- Security check information (such as Access NI, DBS etc)

If you have stated you have previously worked for Viberoptix, Fibrus or an associated contractor, we may refer your application to a relevant HR colleague to assess your employment history.

Examples of other details collected include:

- Health issues requiring adaptations to working environment
- Reporting and managerial relationships
- Leaves of absence (such as maternity leave, sickness absence)
- Disciplinary / grievance records
- Time and attendance details
- Expenses such as travel and expenses claimed from
- Results of original and ongoing employee screening, where relevant
- Details provided in relation to Conduct policies (such as conflicts of interest, personal account dealing, trade body membership and so on)
- Health & safety incidents, accidents at work and associated records
- Building CCTV images
- Audio recordings of telephone interviews
- Video recordings of interviews
- Notes from face to face interviews

Why do we collect this personal information?

To ensure possible employment opportunities are offered to the most suitable candidates, we need to process certain personal information about you. We only process your information where necessary to progress a job vacancy or as required by law or regulatory requirements, so not all the purposes set out below will apply to you all the time.

- **Application:** during the application process we process a variety of details such as your CV, name, address, employment history, academic and professional qualifications, age, diversity (i.e. gender, ethnicity, disability, sexual orientation), nationality, previous disciplinary matters;
- **Assessment:** our assessments vary but could include psychometric tests (such as a situational judgement test, ability or personality test), interviews (face to face, telephone or video) and/or technical assessments;
- **On-boarding:** data collected as part of the application process would be used as part of your employment record collection;
- **Quality and Forecasting:** we assess demand, the fairness of the recruitment process, ensure compliance with legislation which may require use of more sensitive data such as gender and religion (although this type of data is optional for you to share with us);
- **Screening:** county court judgements, credit history, proximity to work, driving licence and skillset.

Our legal basis for processing your data

Where we require your sensitive information as part of the employment process, we will obtain your consent.

We will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Legal Obligations

When we need to use your personal data to comply with a common law or statutory obligation.

We ensure a fair selection process exists, not only because this is how we operate but we have legal obligations to do so. For example:

- Employee Demand Forecasting – to monitor fairness of recruitment (anti-discrimination)
- Right To Work review – for example to check you are entitled to work in the UK

Legitimate Interests

When we use your data for a reason that is considered necessary by Viberoptix and a reason that is reasonably to be expected.

We can process your personal data where it is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of you which require protection of personal data. When we use your personal data as part of a recruitment activity, we want to help ensure any role is right for you and tailored accordingly. Plus we want to help find roles that are more suitable for you.

Establishment, exercise or defence of legal claims

Where a legal claim connected with you is likely to arise then we need to process personal data. We process this personal data, which may include sensitive data in accordance with local laws and requirements for example, we need to take legal advice in relation to legal proceedings or be required by law to preserve or disclose certain information as part of the legal process.

How will we use your information?

We need certain personal information to allow us comply with legal obligations and to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Checking you are legally entitled to work in the UK
- Assessing qualifications for a job
- To determine your suitability for a job
- Dealing with legal disputes involving you
- To prevent fraud
- Analysis, quality control and forecasting role requirements
- We can identify, plan and implement reasonable adjustments for your application process
- To successfully and timely on-board and enable payroll and employee benefits

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

Screening checks

As part of the selection process, we may perform psychometric and screening checks, where permitted by local law. Your consent will be requested before screening checks are performed.

Criminal records checks

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you.

Who do we share your information with?

We may share your personal information internally and with staff involved in the recruitment process or for workforce management purposes. In addition, we may share your information with our third-party service providers, credit reference agencies and any third party whose details you have given to us as a referee or who you have cited in your application such as an academic institution.

Where we share your personal data with another company, we make sure that they respect your data protection rights too by putting in place appropriate contract terms.

We may also share your personal information with a public authority or law enforcement agency (if they ask for it).

International transfers

Some recruitment activities are carried out in locations outside of the United Kingdom. For example, the administration and review of applications, candidate screening, candidate interviews and assessments.

When we transfer your personal information to an international recipient, we ensure appropriate safeguards are in place and that the transfer is carried out in accordance with the Data Protection Act 2018.

How long will we keep your information?

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for; such as any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the following:

- amount, nature, and sensitivity of the personal data
- the potential risk of harm from unauthorised use or disclosure of your personal data
- the purposes for which we process your personal data
- whether we can achieve those purposes through other means and
- the applicable legal requirements.

Typically, we will not keep candidate details for longer than 12 months following the submission of an application; unless there are compelling reasons to retain for a longer period. If you live in Northern Ireland & apply for a job in Northern Ireland, your data will be retained for up to 18 months to comply with NISRA legislative reporting requirements. However, if you don't want us to hold your details for future opportunities, then you can contact us and we will respect your rights where we need to and unless otherwise necessary, we will remove them.

How do we protect your information?

Our HR and Recruitment systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur. 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 they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Where we share information with third parties and other parties located outside of the UK, we only permit them to process your personal data for specified purposes and in accordance with our instructions. We have put in place the appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

Any information sent to us is protected using our security methods. When it reaches us, we store it securely and only provide access to it by those authorised. Although we safeguard your personal information once received, we cannot guarantee the safety of any personal information you transmit to us using online methods.

Your choices and obligations

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights regarding to personal information

You have the right (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- **request access to your personal data:** this right entitles you to request access to personal data Viberoptix processes about you, as well as to certain information on such processing;
- **request rectification of your personal data:** this right entitles you to request the rectification or completion of any of your personal data that would be inaccurate or incomplete;
- **request deletion of your personal data:** this right entitles you to request the deletion of your personal data, including where such personal data would no longer be necessary to achieve the purposes;
- **object to the processing of your personal data:** this right entitles you to request that Viberoptix no longer processes your personal data;
- **request the restriction or objection of the processing of your personal data:** this right entitles you to request that Viberoptix only processes your personal data in limited circumstances, including with your consent;
- **request a copy or the portability of your personal data:** this right entitles you to receive a copy of personal data that you have provided to Viberoptix.
- **right to be informed:** this right will make sure you are provided with clear, transparent and easily understandable information about how we use your information and your rights
- **right to withdraw consent:** To the extent our processing of your personal information is based on your consent, you also have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal.

To exercise any of these rights please contact us at careers@viberoptix.com

If you're not satisfied with our response to your question or concern, or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO).

For additional queries related to how we use your personal information , regarding the personal information we use, please contact us at careers@viberoptix.com