

## **PRIVACY POLICY FOR JOB APPLICANTS**

### **1. INTRODUCTION**

- 1.1 This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we may disclose it to and your rights and choices in relation to your personal information.
- 1.2 This Privacy Policy applies to individuals that are applying to work with us (whether as an employee, worker, contractor, apprentice or intern). This Privacy Policy does not form part of any contract of employment or other contract to provide services. We may update this Privacy Policy at any time.
- 1.3 In this Privacy Policy references to:
- 1.3.1 **we, us or our** means CooperVision Manufacturing Limited (company number **02737396**) **with its registered address at** Delta Park, Concorde Way, Segensworth North, Fareham, Hampshire, PO15 5RL;
  - 1.3.2 **personal information** is information that is about you and which identifies you; and
  - 1.3.3 references to the **CooperVision Group** are to companies within the CooperVision group of companies. A list of the CooperVision Group companies are shown in Addendum 1 of this policy for your information.

### **2. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?**

- 2.1 We are the controller for the purpose of data protection law, in respect of your personal information that is collected and used during and after your working relationship with us.
- 2.2 If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact our Data Protection Officer by email at [dpo@coopervision.com](mailto:dpo@coopervision.com).

### **3. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?**

- 3.1 We will collect, process and use the following personal information about you.

<b>Category of personal information</b>	<b>Examples</b>
Personal details	Name, home address, marital status, maiden name
Business contact details	Company email address, place of work, company telephone number, company mobile number
Personal contact details	Personal email address, home telephone number, personal mobile number
Recruitment information	Application forms, CVs, interview notes, details and verification of education and qualifications, employment history, references, credit reference checks (for certain roles), information collected from aborted applications

Category of personal information	Examples
Medical and health information	Details regarding your health which we may need to make reasonable adjustments for the interview process
CCTV	Images captured on CCTV if you attend interview at our premises
Data created as part of the recruitment and selection process	Notes of your answers and responses during recruitment interviews, results/outcomes of any assessment processes/exercises carried out as part of the recruitment process, notes and scoring as part of our assessment of whether you should be offered a role.

3.2 We may receive the personal information about you from the following sources:

- 3.2.1 information from reference checking agencies (including but not limited to details of any County Court Judgments made against you and employment checks);
- 3.2.2 recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process) from recruitment business, temporary work agencies or the provider of our online recruitment platform;
- 3.2.3 information we have obtained from your referees;
- 3.2.4 information obtained from a background checking provider (including but not limited to checks to verify your employment history and qualifications);
- 3.2.5 providers of training and learning and development courses (including higher and further education institutions); and
- 3.2.6 providers of apprenticeship schemes.

3.3 We may also collect certain sensitive personal information (including any special categories of personal data) about you. This may include information concerning your:

- 3.3.1 health, including any medical condition, any reasonable adjustments requested;
- 3.3.2 criminal convictions and offences; and
- 3.3.3 race or ethnicity, religious beliefs, sex life or sexual orientation<sup>1</sup>.

#### **4. INFORMATION ABOUT THIRD PARTIES**

- 4.1 In the course of your dealings with us you may provide us with personal information relating to third parties, including but not limited to details of your next of kin and emergency contact(s) (as applicable) and employment references.
- 4.2 We will use this personal information in accordance with this Privacy Policy. If you are providing personal information to us relating to a third party, you must have the permission of the third party

to share such personal information with us and you must make the information in this Privacy Policy available to the third party.

**5. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?**

5.1 Your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
Making a decision about your recruitment or appointment and determining the terms on which you work for us.	This processing is necessary for the purposes of taking steps in relation to entering into a contract between you and us.  This processing is also necessary for our legitimate business interests. The legitimate interest relied on is our interest in recruiting the workforce we need to deliver our products and services to our customers.
To provide you with feedback on your performance during a recruitment process or on the decision we have made.	This processing is necessary for our legitimate business interests. The legitimate interest relied on is our interest to run an open and transparent recruitment process and communicate feedback to individuals to maintain and build good relationships with prospective employees.
Assessing your fitness to carry out the functions of the role you have applied for and/or whether it is necessary to make reasonable adjustments for you as part of our recruitment process.	Depending on the circumstances, we process your personal information in order to carry out our employment legal obligations or with your explicit consent.
To communicate with you during the application process.	The legal basis will fall into one of the following two categories, depending on the communication and the purpose for which it was sent: <ul style="list-style-type: none"> <li>• our legitimate business interests in order for us to manage our relationship with you; and/or</li> <li>• necessary for the purposes of taking steps to enter into a contract between you and us.</li> </ul>
To assess whether you might be interested in, or suitable for, other vacancies that might arise in the future.	This processing is also necessary for our legitimate business interests. The legitimate interest relied on is our interest in recruiting the workforce we need to deliver our products and services to our customers.
Checking you are legally entitled to work in the UK.	This processing is necessary for us to comply with our legal obligations.
Dealing with legal disputes involving you.	This processing is necessary for us to comply with our legal obligations.

Purpose	Legal Basis
Complying with our legal or regulatory obligations (including in connection with a court order).	This processing is necessary for us to comply with our legal obligations.
Equal opportunities monitoring.	<p>This processing is necessary for our legitimate business interests. We believe that all of our employees, contractors and workers and our customers and shareholders benefit from the business benefits that a diverse workforce can deliver.</p> <p>Where this involves the processing of sensitive personal data, this is necessary for reasons of substantial public interest or we may obtain your explicit consent.</p>
To ensure the security of our premises and the health and safety of individuals.	The processing of CCTV footage and footage captured from body worn video cameras (for example, those worn by security guards) is necessary for our legitimate business interests. We have a legitimate interest in ensuring the safety and security of our premises and the detection of crime.

5.2 We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of any contract that we have with or in preparation of us entering into a contract with you. If you do not provide the relevant personal information to us, we may not be able to provide the relevant contract to you, but we will notify you if this is the case at the time.

## 6. CRIMINAL RECORDS INFORMATION

6.1 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 in the course of you working for us. In order for us to collect such information, you may be asked to apply for a DBS Check through an online system and provide a copy of the DBS Check certificate to us.

6.2 We will use information about criminal convictions and offences for Aviation Security related roles in order to assess whether applicants for or holders of those roles are legally permitted to work in those roles.

6.3 We will carry out the above checks as we consider them to be necessary in connection with our rights and obligations in connection with employment.

## 7. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?

7.1 You agree that we may share your personal information with:

7.1.1 other companies and entities within the CooperVision Group;

7.1.2 third party service providers who perform CooperVision business operations on our behalf including, IT services, human resources services, medical or health practitioners and other service providers;

- 7.1.3 providers of training and learning and development courses (including higher and further education institutions);
  - 7.1.4 providers of apprenticeship schemes;
  - 7.1.5 recruitment businesses and temporary work agencies for the purposes of providing feedback on your application;
  - 7.1.6 other professional advisers (including accountants, lawyers) that assist us in carrying out our business activities; and
  - 7.1.7 third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or instructions of a regulatory body (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us) or to protect our rights, property or safety of our clients, employees or other third parties.
- 7.2 We may also disclose your personal information to other third parties, for example:
- 7.2.1 in the event that we sell or buy any business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets;
  - 7.2.2 if we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets; and
  - 7.2.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply the agreements concerning you (including agreements between you and us).

## **8. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?**

- 8.1 We will transfer personal information outside the European Economic Area (**EEA**). Where we transfer personal data outside of the EEA, we will implement appropriate and suitable safeguards to ensure that such personal information will be protected as required by applicable data protection law. For example, where your personal information is transferred to the CooperVision Group, the safeguards which we typically put in place are the European Standard Contractual Clauses as permitted by data protection law and in particular Article 46(2) of the General Data Protection Regulation 2016/679.
- 8.2 For further information as to the safeguards we implement please contact our Data Protection Officer by e-mail at [dpo@coopervision.com](mailto:dpo@coopervision.com).

## **9. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?**

- 9.1 If your application to work with us is successful, we will keep your personal information in accordance with our Privacy Policy for Employees, Workers, Contractors, Apprentices and Interns which we will provide or make available to you when you join us or when sending you an offer of employment or engagement.
- 9.2 If your application to work with us is unsuccessful, we will keep your personal information for the duration of the application process and a period of up to 2 years after you receive confirmation from us that your application was unsuccessful.

9.3 Please note that all of the above retention periods may be extended where we need to preserve and use personal information for the purposes of bringing or defending a legal claim. In such cases, we will continue to hold and process your personal information for as long as is necessary to deal with the legal proceedings.

**10. YOUR RIGHTS**

10.1 You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights.

10.2 If you wish to exercise any of the below rights, please can contact our Data Protection Officer by e-mail at [dpo@coopervision.com](mailto:dpo@coopervision.com).

	<b>Summary of your rights</b>
<b>Right of access to your personal information</b>	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.  Any access request is free of charge. We may require further information in order to respond to your request (for instance, evidence of your identity and information to enable us to locate the specific personal information you require).
<b>Right to rectify your personal information</b>	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
<b>Right to erasure of your personal information:</b>	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
<b>Right to restrict the use of your personal information</b>	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
<b>Right to data portability</b>	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your

	<b>Summary of your rights</b>
	consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
<b>Right to object to the use of your personal information</b>	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
<b>Right to object to decision which is based solely on automated processing</b>	You have the right in certain circumstances not to be subject to a decision which is based solely on automated processing without human intervention.
<b>Right to withdraw consent</b>	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
<b>Right to complain to the relevant data protection authority</b>	You have the right to complain to the relevant data protection authority, which is in the case of us, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.

## 11. CHANGES TO OUR PRIVACY POLICY

- 11.1 Any changes we make to this Privacy Policy in the future will be displayed within our recruitment portal that is available to all candidates <https://coopervision.co.uk/careers>.

This Privacy Policy was last updated in February 2019.

## **Addendum 1**

### **List of CooperVision Affiliates**

- CooperVision Limited (company number 03685161) with its registered address at Delta Park, Concorde Way, Segensworth North, Fareham, Hampshire, PO15 5RL, UK
- CooperVision Manufacturing Limited (company number 02737396) with its registered address at Delta Park, Concorde Way, Segensworth North, Fareham, Hampshire, PO15 5RL, UK
- CooperVision SAS (company number 392 002 218) with its registered address at Les Collines De Sophia, 1800 Route Des Cretes, Sophia Antipolis 06905, Cedex, France
- CooperVision Italia, S.R.L. (company number 10653750157) with its registered address at Via Meravigli, 16 – 20123 Milan, Italy
- CooperVision Iberia, S.L. (company number 79424594) with its registered address at Ronda de Poniente, 12, 28760 Tres Cantos, Madrid, Spain
- CooperVision Nordic AB (company number 556568-1243) with its registered address at Johan Willins gata 8, SE-41664 Goteborg, Sweden
- CooperVision GmbH (company number HRB 33358) with its registered address at Siemensstraße 3, 64859, Eppertshausen, Germany
- CooperVision Nederland B.V. (company number 23075034) with its registered address at Avelingen - West 40, 4202, MS Gorinchem, Netherlands
- CooperVision Poland Sp. z o.o. (company number 0000464435) with its registered address at Przemysława Gintrowskiego 53, 02-697 Warsaw, Poland
- CooperVision Kft (company number 01-09-166734) with its registered address at Sopron ut 25-27, Budapest, 1117, Hungary
- CooperVision Limited, organizacni slozka (company number 24838411) with its registered address at Na Pankráci 1724/129, Praha 4, 140 00, Czech Republic
- CooperVision Distribution Sprl (company number 0879.484.449) with its registered address at Premiere Avenue 32, B-4040, Belgium
- CooperVision Inc. (company number C1893655) with its registered address at 6150 Stoneridge Mall Rd, Suite 370, Pleasanton, CA 94588, USA
- The Cooper Companies Inc. (company number C0986090) with its registered address at 6140 Stoneridge Mall Rd, Suite 590, Pleasanton, CA 94588, USA