

STA TRAVEL INTERNATIONAL LTD

RECRUITMENT EMPLOYEE PRIVACY NOTICE

INTRODUCTION

This Notice explains what personal information we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

This Notice describe the information we collect, how we collect the information, why we collect the information, how we may use and share the information we collect. This Notice is intended to comply with our obligations to provide you with the information about us processing of your personal information under data protection laws. It does not form part of your contract of employment or engagement. Where we use the term employment in this Notice, this also includes other engagements or work relationship.

If you have any questions regarding the processing of your personal information or if you believe your data protection rights have been violated, please contact our HR Office at cornerstone.help@statravel.com.

WHO COLLECTS THE INFORMATION?

STA Travel International Ltd which is referred to in this Notice as "we" or "us" trading as STA Travel is a 'data controller' and gathers and uses certain information about you. We collect and processes your personal information for the purposes described in this Notice. Personal information is defined to include any data that are in STA Travel's possession, custody or control that relates to any individual who could reasonably be identified either from that data such as name, job title or email address or from that data and other information such as telephone numbers, address, logon credentials, credit card numbers or identification numbers.

Your personal information may be shared with other STA Travels group companies, but only subject to your requirement that those companies receiving your personal information process it only in accordance with the Notice and relevant data protection laws.

If you have any questions regarding the processing of your personal information or if you believe your data protection rights have been violated, please contact our HR Office at cornerstone.help@statravel.com.

DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information.

ABOUT THE INFORMATION WE COLLECT AND HOLD

The table set out in 0 of **Error! Reference source not found.** below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in 0 of **Error! Reference source not found.** below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

WHERE INFORMATION MAY BE HELD

Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives.

HOW LONG WE KEEP YOUR INFORMATION

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information including interview notes for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination as extended to take account of early conciliation, after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

YOUR RIGHT TO OBJECT TO US PROCESSING YOUR INFORMATION

Where our processing of your information is based solely on our legitimate interests or those of a third party, you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact our please contact our HR Office at cornerstone.help@statravel.com.

YOUR RIGHT TO CORRECT AND ACCESS YOUR INFORMATION AND ASK FOR IT TO BE ERASED

Please contact our please contact our HR Office at cornerstone.help@statravel.com if in accordance with applicable laws you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice.

You also have the right to ask our please contact our HR Office at cornerstone.help@statravel.com will provide you with further information about the right to be forgotten, if you ask for it.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

HOW TO COMPLAIN

We hope that our please contact our HR Office at cornerstone.help@statravel.com can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner [here](#) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

ABOUT THE INFORMATION WE COLLECT AND HOLD

PART A UP TO AND INCLUDING THE SHORTLISTING STAGE

The information we collect.	How we collect the information.	Why we collect the information.	How we use and may share the information.
Your name and contact details i.e. address, home and mobile phone numbers, email address.	From you	<p>Legitimate Interest: to carry out a fair recruitment process.</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages.</p>	<p>To enable HR personnel or the hiring manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome.</p> <p>To inform the relevant hiring manager or department of your application.</p>
Details of your qualifications, experience, employment history including job titles, salary and working hours and interests.	From you, in the completed application form and interview notes if relevant.	<p>Legitimate Interest: to carry out a fair recruitment process.</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and if relevant to recruit</p>	<p>To make an informed recruitment decision.</p> <p>The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details.</p>
Your name, contact details and details of your qualifications, experience, employment history and interests.	From you, in the completed application form and interview notes if relevant.	<p>Legitimate Interest: to carry out a fair recruitment process</p> <p>Legitimate Interest: if you are unsuccessful in your application, your details may be passed on to an associated company to see if they have any suitable vacancies.</p>	To see whether an associated company has any suitable vacancies.
Details of your referees.	From your completed application form.	Legitimate Interest: to carry out a fair recruitment process.	<p>To carry out a fair recruitment process.</p> <p>Information shared with relevant hiring managers, HR personnel and the referee.</p>

If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

PART B

BEFORE MAKING A FINAL DECISION TO RECRUIT

The information we collect.	How we collect the information.	Why we collect the information.	How we use and may share the information.
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers	From your referee's details of whom you will have provided.	Legitimate Interest: to make an informed decision to recruit. Legitimate Interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice.	To obtain the relevant reference about you. Information shared with relevant hiring managers and HR personnel.
Information regarding your academic and professional qualifications	From you, from your education provider, from the relevant professional body.	Legitimate Interest: to verify the qualifications information provided by you.	To make an informed recruitment decision.
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office.	To comply with our legal obligations	To carry out right to work checks. Information may be shared with the Home Office.

If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

Further details on how we handle sensitive personal information and information relating to criminal convictions and offences, *as required under GDPR and DPA 2018 and other applicable laws*. Please contact our HR Office at cornerstone.help@statravel.com if you have any question.