



ENESCO LIMITED

RECRUITMENT PRIVACY NOTICE

Enesco Ltd., Brunthill Road, Kingstown, Carlisle CA3 0EN is registered as a data controller with the Information Commissioner's Office (ICO) for the purposes of the General Data Protection Regulation (Regulations) and is committed to ensuring that the personal data of job applicants is handled in accordance with the principles set out in the Regulations.

This privacy notice describes how we collect and use personal information about you during the recruitment process in accordance with the Regulations. Enesco Ltd. takes the security of your data seriously. Enesco Ltd. has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed by employees except where necessary for the performance of their duties.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

WHAT INFORMATION DO WE HOLD?

Enesco Ltd holds and processes personal data and special categories of personal data (previously referred to as sensitive personal data) during the recruitment process.

This information is normally provided to Enesco Ltd. by a prospective member of staff on an application form or CV. Information about prospective staff is retained and disposed of in accordance with Enesco Ltd's Policy Statement for Retention and Disposal of Records. If your application for employment is unsuccessful, we will ordinarily hold your data on file for 6 months after the end of the relevant recruitment process.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment and further details about our processing activities will be provided to you in a new privacy notice.

Personal Data

The current definition defines personal data as 'any information relating to an identified or identifiable natural person. This includes 'direct identification' e.g. from the name of the employee or 'indirect identification' e.g. any other information that could identify the individual. It does not include data where the identity has been removed (anonymous data). Enesco Ltd collects and processes the following personal data about you during the recruitment process:

- your name, title, address and contact details, including personal email address and telephone number, date of birth and gender;

- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers;
- recruitment information including any CV, cover letter or other personal data provided to us as part of your application for work
- information about your current level of remuneration and benefits;
- information about your nationality and entitlement to work in the UK, including copies of any documents evidencing such right;
- copy of your diving licence;
- any information you provide to us during an interview;
- photographs.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious or philosophical beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences

Certain information, such as contact details and documents proving your right to work in the UK have to be provided to enable Enesco Ltd to enter into a contract of employment with you. If you do not provide this information, Enesco Ltd will not be able to process your application and offer you employment.

WHY DO WE PROCESS PERSONAL DATA?

Enesco Ltd needs to process certain personal data about its staff for a number of administrative purposes. We will only process your personal data when the law allows us to. Most commonly, we will process your personal data in the following circumstances (which are identified by the relevant number of asterisks alongside the practical uses below):

1. Where we need to perform the contract we have entered into with you (*);
2. Where we need to comply with a legal obligation (**);
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (***) .

The situations in which we will process your personal information are listed below, using asterisks to indicate the purpose or purposes for which we are processing or will process your personal information.

- Making a decision about your recruitment or appointment ***
- Determining the terms on which you work for us ***
- Checking you are legally entitled to work in the UK * / **

- Assessing qualifications, skills or suitability for a particular job ***
- Communicate with you about the recruitment process ***
- Dealing with legal disputes involving you ***
- Keep records relating to our recruitment processes ** / ***
- Ascertaining your fitness to work * / ** / ***
- Equal opportunities monitoring ** / ***

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

"Special categories" of particularly sensitive personal information require higher levels of protection. Enesco Ltd. needs to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our Data Protection Policy.
3. Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our Data Protection Policy.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability, to ensure you are able to participate in any recruitment process and to assess your fitness to undertake the role applied for or to provide appropriate workplace adjustments.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

For some roles, the company is obliged to seek information about criminal convictions and offences. Where the company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

HOW DO WE USE THIS DATA?

General Principles

Enesco Ltd will process your information in accordance with the Regulations and its own Data Protection Policy. To comply with the law, information about individuals must be collected and used fairly, stored safely and securely, be adequate, relevant and not excessive, be kept accurate and up to date, held only as long as necessary and not disclosed to any third party unlawfully.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

If you believe that Enesco has not complied with your data protection rights, you can complain to the Information Commissioner.

How do we use your information within Enesco Ltd.?

Within the company, personal data may be shared with employees who legitimately need the information to carry out their duties as part of any recruitment exercise. This includes members of the HR, payroll and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The amount of personal information shared within Enesco Ltd will be no more than is necessary for the purpose set out above.

HOW DO WE SHARE DATA WITH THIRD PARTIES?

Enesco Ltd will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Enesco Ltd will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain any necessary criminal records checks.

Occasionally, Enesco Ltd may engage a recruitment company in order to assist in filling a job vacancy, in which case we will share personal data with such recruitment company and ensure that they comply with their obligations under GDPR in respect of the data.

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you using solely automated means, however we will notify you in writing if this position changes.

YOUR RIGHTS IN RELATION TO YOUR DATA

The right of access

You have certain rights with respect to the data held about you by Enesco Ltd. You can make a written request to obtain access to the data held about you by Enesco Ltd. This is called a Subject Access Request. Enesco Ltd. will deal with such requests in accordance with the statutory legislation.

The right to erasure

You have a right to request deletion or removal of personal data. This is also known as 'the right to be forgotten'. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information

where you have exercised your right to object to processing (see below). Please note that this is not an absolute right requiring us to delete all personal data we hold about you.

The right to request correction of personal data

You can request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

The right to object to processing

You can object to Enesco Ltd processing your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

The right to request restriction of processing

You can request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

The right to request the transfer of personal data

You can request the transfer of your personal data to another data controller in electronic format.

The right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Director of Human Resources. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

CHANGES TO THIS PRIVACY NOTICE

Enesco Ltd reserves the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal data.

FURTHER INFORMATION

Should you require any further information in relation to Data Protection within Enesco Ltd., or wish to exercise any of the rights set out above, please contact the Director of Human Resources at the address above.