



Recruitment Privacy Statement

Data Protection Lead: Steve Corbett

As part of any recruitment process, TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd collect?

We collect a range of information about you. This includes, but is not limited to:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which Panache needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK;

We collect this information in a variety of ways. For example, data might be contained in CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will request the information from you before doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Where TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

We process health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, we will keep your personal data on file in case there are future employment opportunities for which you may be suited. You are free to withdraw your consent at any time.



Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR 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.

TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. We will then share your data with former employers to obtain references for you.

How does TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd protect data?

We take the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd keep data?

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

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. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact Lauren Atherton, HR Manager. You can make a subject access request by completing our form for making subject access requests.

If you believe that TGW (Holdings) Ltd and/ or Wolstenholme Machine Knives Ltd has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to TGW (Holdings) Ltd and Wolstenholme Machine Knives Ltd during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Automated decision-making

Recruitment processes are not based solely on automated decision-making.