

Introduction

As part of any recruitment process, Lucid Group* collects and processes personal data relating to job applicants. This Privacy Notice sets out the basis on which Lucid Group will process personal data provided to us.

We take our obligations in respect of the privacy of personal data seriously and we will only process personal data as detailed in this notice, unless we inform you otherwise. In order to ensure that the personal data we hold is accurate and up to date, we request that you inform us of any relevant changes to the personal information we hold about you.

Lucid Group is committed to complying fully with the UK General Data Protection Regulation and the Data Protection Act 2018. We respect the privacy rights of our applicants (past and present) and apply appropriate safeguards to protect their personal data.

*Lucid Group means all companies within Lucid Group Communications Limited.

The personal information we collect or receive are:

Lucid Group obtains and holds personal data relating to its job applicants consisting of:

- Name, address, mobile phone number and email address
- Copies of Passports and Visa and other identity documents relating to your entitlement to work in the UK
- Information about your career history, skills, experience and qualifications
- References (requested only for the successful applicant).

We also sometimes obtain and hold more sensitive types of data called special category data. It consists of:

- Information about your health, medical condition(s) where there are reasonable adjustments requirements during the recruitment process.
- Unspent criminal convictions
- References from previous employers for successful applicants.

How we use your personal information

Lucid Group need to use and retain applicant's data for a wide variety of purposes; these are:

- The recruitment, assessment and testing of job applicants
- Processing data and monitoring to comply with our obligations regarding discrimination
- Compliance with statutory and regulatory obligations on Lucid Group
- Managing legal disputes involving applicants, employees and/or third parties
- Exercising or fulfilling Lucid Group's legal rights and responsibilities
- Prevention or detection of fraud, crime or other unlawful or inappropriate conduct.

We may share your personal information

We will not share your personal data unless we are legally entitled to do so and sharing the data is also necessary. The categories of persons with whom we share your personal information are:

Lucid Group Communications Limited



- Lucid Group management when assisting in the recruitment process
- Our professional advisers, such as solicitors or accountants
- Government departments and government agencies pursuant to a request for information or any legal obligation which applies to us
- Police and law enforcement agencies
- Courts and tribunals
- Insurers
- Third parties to gain references
- Partners, suppliers, agents and service providers who process data on our behalf which include:
 - background screening providers
 - storage service providers including cloud
 - providers of psychometric testing

Legal basis for using applicant data

Lucid Group collects and uses applicant data because it is necessary for:

- Our legitimate interests as a recruiter of employees for Lucid Group
- Compliance with legal obligations which, amongst other things, requires us to maintain records for specific periods

We may process your personal data on the basis that you have consented to us doing so for a specific purpose, for example, processing your application and considering your suitability for a specific role.

Where we process your special category data, (for example, health data) we require additional grounds for processing that data and the grounds we rely upon are:

- The applicant has given explicit consent
- Processing is necessary for the purposes of carrying out obligations and exercising rights in connection with employment, social security or social protection law
- Processing is necessary for reasons of substantial public interest including the prevention and detection unlawful activity.

Where applicant data is collected and used solely based on consent (including explicit consent) **applicants have the right to withdraw consent at any time.**

As an applicant you are under no legal or contractual obligation to provide your personal data to Lucid Group. However, if you do not provide the information or do not provide consent where we expressly rely on consent to process your data, we may not be able to process your application properly or at all.

International transfers of data

It is necessary for the Lucid Group to transfer some employee applicant data outside of the UK, this will typically occur when we exchange information with our management team based in the US or when service providers, for example IT companies that need to access such data, are located outside the UK.

Where this takes place, we will ensure that the transfer is compliant with UK GDPR and we will ensure that the personal data is secure. We will rely on standard data protection clauses which have been

approved by the Information Commissioners Office in accordance with the UK GDPR. A copy of the standard clauses can be obtained at the following link:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers-after-uk-exit/sccs-after-transition-period/>

Where appropriate and lawful, we will occasionally transfer data outside the UK without relying on the standard data protection clauses, including where:

- the applicant has explicitly consented to the transfer or;
- it is necessary in connection with legal disputes and claims.

Data Retention

We will not process unsuccessful applicant data for longer than necessary and will delete it once it is no longer required for the purposes set out in the Policy. The longest we will normally hold any applicant personal data is for 1 year after the recruitment process has finished.

Your rights

Applicants have several rights under the UK GDPR. They include the right to request that Lucid Group:

- Provides them with a copy of the personal information held on them
- Corrects inaccurate information
- Deletes information which Lucid Group does not have a legitimate basis to hold.

Applicants also have rights to restrict the processing of data relating to them, object to processing and in certain circumstances to 'data portability' (this means that data held is provided in a structured electronic, commonly used and machine-readable format).

Detailed information on these rights can be found in the Regulation or the website maintained by the Information Commissioners Office at <https://ico.org.uk>

These rights can be exercised free of charge and Lucid Group will normally respond within a month.

If you wish to exercise any of the above rights, please email our Compliance Team at Compliance@wearelucidgroup.com.

Complaints

If you are unhappy about the way your personal data has been handled by the Lucid Group Limited you have the right to lodge a complaint with either our Head of Legal & Compliance at Doris.Cheng@wearelucidgroup.com or directly with the Information Commissioners Office. Further information including contact details are available at <https://ico.org.uk>