









**HOLT LLOYD INTERNATIONAL LIMITED**  
**HOLT LLOYD SERVICES (UK) LTD**  
**Role Application Privacy Notice**

**Table of Contents**

Topic	Page number
KEY SUMMARY	2
ABOUT US AND THIS NOTICE	 3
USEFUL WORDS AND PHRASES	 4
WHAT INFORMATION DO WE COLLECT?	 4
WHY DO WE PROCESS YOUR PERSONAL DATA?	 8
HOW IS PROCESSING YOUR DATA LAWFUL?	 9
WHEN WILL WE DELETE YOUR DATA?	 11
WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?	 11
YOUR RIGHTS	 13

## **KEY SUMMARY**

**We process your personal information provided in the course of applying for a role with us in order to carry out our recruitment process and for no other purpose.**

**This notice explains what data we process, why, how it is legal and your rights.**

## ABOUT US and THIS NOTICE



This Privacy Notice is provided by each of Holt Lloyd International Limited ("**Holt International**") and Holt Lloyd Services (UK) Ltd ("**Holt Services**") (collectively "**Holts**" or "**we**" or "**us**") who are separate 'controllers' for the purposes of the **Data Protection Laws**.

You should read this Privacy Notice if you are applying for a role with us.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our **processing** and your rights.

### How to contact us

If you need to contact us about this Privacy Notice, use the details below

- Data Privacy Manager ("**DPM**"): Robert Lawrence
- Address: KIK Custom Products, 101 MacIntosh Boulevard  
Concord, Ontario, Canada L4K 4R5
- Telephone number: +1 905-660-2966
- Email: [privacy@holtsauto.com](mailto:privacy@holtsauto.com)

If you would like this Privacy Notice in another format (for example: audio, large print, braille), please contact us.

### Changes to this Privacy Notice

We may change this Privacy Notice from time to time. We will alert you by email when changes to the purpose of processing are made. The latest version will be available at <https://www.holtsauto.com/working-holts/>. Alternatively, please contact us using the details in the above section "How to Contact Us".

Current version: [May 2019]

## USEFUL WORDS AND PHRASES



Please familiarise yourself with the following words and phrases (used in **bold**) as they have particular meanings in the **Data Protection Laws** and are used throughout this Privacy Notice:

Term	Definition
<b>controller</b>	This means any person who determines the purposes for which, and the manner in which, any <b>personal data</b> is <b>processed</b> .
<b>criminal offence data</b>	This means any information relating to criminal convictions and offences committed or allegedly committed.
<b>Data Protection Laws</b>	This means the laws which govern the handling of <b>personal data</b> . This includes the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018 and any other national legislation that relates to data protection and privacy.
<b>data subject</b>	The person to whom the <b>personal data</b> relates.
<b>personal data</b>	<p>This means any information from which a <u>living individual</u> can be identified.</p> <p>This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs and voice recordings. It will also include expressions of opinion and indications of intentions about <b>data subjects</b> (and their own expressions of opinion/intentions).</p> <p>It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.</p>
<b>processing</b>	<p>This covers virtually anything anyone can do with <b>personal data</b>, including:</p> <ul style="list-style-type: none"> <li>• obtaining, recording, retrieving, consulting or holding it;</li> <li>• organising, adapting or altering it;</li> <li>• disclosing, disseminating or otherwise making it available; and</li> <li>• aligning, blocking, erasing or destroying it.</li> </ul>
<b>processor</b>	This means any person who <b>processes</b> the <b>personal data</b> on behalf of the controller.

Term	Definition
<b>special categories of data</b>	<p>This means any information relating to:</p> <ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• political opinions;</li> <li>• religious beliefs or beliefs of a similar nature;</li> <li>• trade union membership;</li> <li>• physical or mental health or condition;</li> <li>• sexual life; or</li> <li>• genetic data or biometric data for the purpose of uniquely identifying you.</li> </ul>
<b>supervisory authority</b>	<p>This means the local regulator that is responsible for implementing, overseeing and enforcing the Data Protection Laws in a given country. The relevant supervisory authorities in relation to this Privacy Notice are listed below:</p> <ul style="list-style-type: none"> <li>• UK: Information Commissioner's Office ("<b>ICO</b>")</li> <li>• Germany: Federal Commissioner for Data Protection and Freedom of Information ("<b>BfDI</b>")</li> <li>• France: Commission nationale de l'informatique et des libertés ("<b>CNIL</b>")</li> </ul>

## WHAT PERSONAL DATA DO WE COLLECT?



The sections below set out the categories of **personal data** we may ask for at each stage of your application for a job with us. Some data may not be required depending on the type of role you are applying for. The reasons why we need each category of data are set out in the section 'Why do we need your personal data'.

If you choose not to provide us with any of these categories of information, your application may be rejected or it could affect our ability to process your application.

### Pre-application

If you contact us with any questions prior to submitting an application for a job, we will keep a record of your name and contact details, as well as details of question(s) you have asked.

### If you submit an application or send us a CV

If you submit an application for a job with us, we will ask you for the following:

- Your contact details, including your name, address, e-mail address and telephone number.
- Details of your relevant education and employment history, including copies of professional credentials/diplomas and date of birth.
- Details of referees.

If you submit a CV to us and it contains additional information, we will process whatever information you provide in your CV.

### Assessment Stage

If you are successful in our initial shortlisting stage, we may invite you for an interview, assessment day, or to complete online tests. Information will be generated by you and by us during this process. For example, you might complete written tests, undertake group exercises or we might take interview notes.

### If we make you a conditional offer

If we make you a conditional offer of employment, we may gather further **personal data** before deciding whether to make you a final offer, to check:

- Proof of eligibility to work in the relevant country
- Proof of your qualifications
- (For Holt International ONLY) Pre-employment health questionnaire subject to and to the extent permitted by applicable laws.
- Right to Work checks

If we make and you accept a final offer

We will require further information from you in order to meet our obligations as an employer, such as your bank details so that we can pay your salary. How we process your information as an employee is set out in our Staff Privacy Notice which you will have access to when you start your employment.

**Personal information provided by third parties**

Most of the **personal data** we **process** about you when you apply for a job is information that you give us directly, or is generated through the recruitment exercise. However, some information we gather from third parties, noted below.

Recruitment Agency: We fill some of our roles through recruitment agencies. If you apply for a role through them, they will pass us details of your name, contact details, CV, notes of interview with the agency.

Your former employer and other referees: (For Holt International, Holt Services in France ONLY) If you apply for a role with us and provide us with details of referees whom we can contact, we will contact your referees directly, using the details you provide in your application, to request a reference.

Home Office: We may in certain circumstances need to seek confirmation from the Home Office or equivalent authority in France or Germany that you have the right to work in the UK, France or Germany.

## WHY DO WE NEED YOUR PERSONAL DATA?



We use your **personal data** for the purposes listed in the table. We are allowed to do so on certain legal grounds which are also set out in the table (and which are explained further in the section '[Legal grounds for processing personal data](#)').

### Personal data

Type of data	Why do we need it?	Legal grounds for processing
Contact details (name, email address, telephone number, home address)	So that we can contact you about your application for a job with us.	Legitimate interests  Necessary in order to take steps at your request prior to entering into a contract with you.
Education and employment history, and proof of qualifications	So that we can assess your relevant experience and suitability for a job with us, and assess what your training needs would be if you started working for us.	Legitimate interests  Necessary for the decision on the establishment of an employment relationship
Information provided by professional and personal referees	So that we can assess your relevant experience and suitability for a job with us.	Legitimate interests  Necessary for the decision on the establishment of an employment relationship
Information generated during the recruitment process itself (such as interview notes, psychometric test results and your answers to assessment questions)	So that we can assess your relevant experience and suitability for a job with us.  Psychometric tests help us understand your characteristics and working-style preferences.	Legitimate interests  Necessary for the decision on the establishment of an employment relationship



Type of data	Why do we need it?	Legal grounds for processing
Information about your regulatory or other professional memberships	So that we can comply with our legal obligation (and obligation to our professional insurers) to make sure that individuals carrying out certain regulated roles are appropriately registered.	Compliance with a legal obligation
	So that we can assess your relevant experience and suitability for a job with us (where this is relevant for certain senior roles where there is no legal requirement to be registered with a regulator).	Legitimate interests

**Special categories of personal data and criminal offences data**

Type of data	Why do we need it?	Legal grounds for processing
Identity documents such as a copy of your passport (including information about your national origin) or other right to work documentation	So that we can comply with our obligation to check that our employees have the right to work in the UK, France and/or Germany.	Necessary for complying with our legal obligations and exercising our rights as an employer.
Information about a disability which may affect the application process.	To make reasonable adjustments to our application process for your disability.	Necessary for complying with our legal obligations and exercising our rights as an employer.
Pre-employment health data.	To the extent permitted by applicable law, to determine whether you are medically able to carry out the work you have been offered, and to assess whether any adjustments are	Necessary for complying with our legal obligations and exercising our rights

Type of data	Why do we need it?	Legal grounds for processing
	needed to the work environment to enable you to carry out that work.	as an employer.  Necessary for assessing your working capacity as an employee.
(For positions in Holt Services France ONLY) Information obtained from the <i>Ministère de la Justice</i>	To meet our legal obligation to check whether there are any criminal convictions ( <i>casier judiciaire national</i> ) which would prevent you from working in the role you have applied for.	Necessary for complying with our legal obligations and exercising our rights as an employer.

## LEGAL GROUNDS FOR PROCESSING PERSONAL DATA



We have set out below a description about each of the legal grounds on which we **process** your **personal data**.

### Reasons for processing your personal data:

- Necessary for in order to take steps at your request prior to entering into a contract with you: We process some **personal data** if doing so is necessary in order to take steps prior to entering into a contract with you.
- Necessary for the decision on the establishment of an employment relationship
- Necessary for our legitimate interests: We process some **personal data** if doing so is in our legitimate interests as an employer. In order to do so, we have considered the impact on your interests and rights, and have put in place appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You have the right to object to the **processing** of your **personal data** on this ground. See section headed 'Your Rights' to find out how.
- Necessary for the compliance with a legal obligation: We have to process some of your **personal data** in order to comply with certain of our legal obligations.

### Additional conditions for processing special categories of data

- Necessary for compliance with our obligations under employment law: We have to process some of **special categories of data** in order to comply with certain of our legal obligations.
- Necessary for the purposes of exercising specific rights in the field of employment law, social security and social protection: In Germany, the Data Protection Laws allow us to process certain **special categories of data** if necessary for the aforementioned purposes if there is no reason to believe that the data subject's legitimate interests in the exclusion of the processing prevails.
- Necessary for the purposes of occupational medicine, including the assessment of your working capacity as an employee: To the extent permitted or required under applicable law, we will process information about your health in order to assess your medical capacity to perform the job you have applied for.
- Necessary to establish, exercise or defend legal claims: we may need to **process special categories of data** in order to exercise our legal rights and bring or defend claims.

# WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?



Our parent company, KIK Custom Products Inc. (based in USA) provides us with our IT system acting as our **processor**. We use other providers that act as our **processors** who provide typical services required by all companies to support our business (e.g. website hosting and email marketing service). If you would like to know the names of those providers please contact us using the details at the start of this Privacy Notice.

In addition, where applicable, we share your **personal data** with the following entities who act as separate **controllers** of your **personal data**. You should review their privacy notices to find out how they **process** your **personal data**. If you have any queries or complaints about how they **process** your **personal data** by them, please contact them separately using the contact information provided on their website. We may also share your **personal data** with other entities who belong to the same category as those indicated below and our auditors and debt and equity investors as well as investors who may be interested in buying all or part of our companies, businesses or other assets.

- Reed – Recruitment Agency
- Forrest Recruitment – Recruitment Agency
- Winners Recruitment – Recruitment Agency
- Ministère de la Justice

We will also share your **personal data** with the police, other law enforcements or regulators where we are required by law to do so.

## **Transfers of your personal data outside the UK and the EEA**

We need to transfer your personal data to the US for KIK Custom Products Inc. to provide us with IT services. Any transfer of your data will be carried out in accordance with the law to safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms. In case of the US, we ensure that the relevant company has entered into a data transfer agreement containing clauses offering an adequate level protection according to the European Commission, has adopted corporate binding rules, benefits from the U.S. "Privacy Shield" accreditation or has otherwise implemented appropriate safeguards. In the event that KIK Custom Products Inc. uses service providers based in other countries outside the UK and EEA, we will ensure that the transfer of personal data is carried out in accordance with the Data Protection Laws using appropriate safeguards. If you want to know more about how data is transferred, please contact us using the details in the above section "How to Contact Us".

### **How we keep your personal data secure**

We strive to implement appropriate technical and organisational measures in order to protect your **personal data** against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of **processing**. We aim to ensure that the level of security and the measures adopted to protect your **personal data** are appropriate for the risks presented by the nature and use of your **personal data**. We follow recognised industry practices for protecting our IT environment and physical facilities.

## WHEN WILL WE DELETE YOUR DATA?



If your application for a role with us is unsuccessful or you do not accept our offer of employment/service, then we will delete all of the **personal data** gathered during the recruitment exercise as follows:

- (i) For applications to Holt International, six months after the relevant recruitment exercise has ended;
- (ii) For applications to Holt Services (French branch), for the purposes of further opportunities, the period for which we sought your explicit consent or, if you do not reply to our request to keep this personal data for this purpose, 2 years after your last contact, without prejudice to our right to archive this data up to 6 years for the purposes of defending ourselves against any legal action (or as long any dispute to which this information is relevant is not finally settled); and
- (iii) For applications to Holt Services (German branch), six months after notification of the rejection of the application by us or the offer by you, unless further storage of data is necessary to defend ourselves against possible legal claims or for any other legal disputes, in which case we will store such data as long as any dispute to which this information is relevant is finally settled.

If your application for a role with us is successful and you start work as our staff, you will have access to the Staff Privacy Notice and the HR Records Retention and Destruction Policy which provide details of how long we retain the data gathered during the recruitment exercise. If you apply for a new role with us when you are already our staff, this Privacy Notice applies in respect of any new information gathered during that application process, and the Staff Privacy Notice continues to apply in respect of any information we already hold by virtue of you being a current staff.

Please also be advised of the following retention periods applicable to exercises of rights in France:

<b>Data we process</b>	<b>How long this will be held for</b>
Data relating to the exercise of the right of opposition with a controller established in France.	Six to seven years in archives after the response to the request or, in case of any pending litigation at the end of this period for which this data is relevant, after final settlement thereof
Data relating to the exercise of other rights such as the right of access or rectification with a controller established in France	One to two years in archives after the response to the request or, in case of any pending litigation at the end of this period for which this data is relevant, after final settlement thereof

## YOUR RIGHTS



As a **data subject**, you have the following rights under the **Data Protection Laws**:

- Right to object to **processing** of your **personal data**;
- Right of access to **personal data** relating to you (known as data subject access request);
- Right to correct any mistakes in your **personal data**;
- Right to prevent your **personal data** being **processed**;
- Right to erasure;
- Rights in relation to automated decision-making (not applicable);
- Right to withdraw your consent where processing is based on your consent (not applicable); and
- Right to have your **personal data** ported to another **controller** (not applicable).

These rights are explained in more detail below. If you want to exercise any of your rights, please contact us (please see section "How to Contact Us").

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex and/or if we receive a high number of requests, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the **Data Protection Laws**.

Holt Services (French branch): According to French Data Protection Laws, you may instruct us on how to handle your **personal data** after your death.

- Right to object to processing of your personal data

You may object to us **processing** your **personal data** where we rely on a legitimate interest as our legal grounds for **processing**.

If you object to us **processing** your **personal data** we must demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in the section headed "Why do we need your personal data". In particular, without processing your data, we will not know as much about you which could affect our assessment of your suitability for a job with us.

- Right to access personal data relating to you

You may ask to see what **personal data** we hold about you and be provided with:

- a copy of the personal data;
- details of the purpose for which the personal data is being or is to be **processed** and the categories of personal data concerned;

- details of the recipients or categories of recipients to whom the personal data is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- the period for which the personal data is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and
- whether we carry out an automated decision-making, or profiling, and where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please provide us as much information as possible about the type of information you would like to see.

➤ Right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold. If you would like to do this, please let us know what information is incorrect and what it should be replaced with.

➤ Right to restrict processing of personal data

You may request that we stop **processing** your **personal data** temporarily if:

- you do not think that your data is accurate. We will start **processing** again once we have checked whether or not it is accurate;
- the **processing** is unlawful but you do not want us to erase your data;
- we no longer need the **personal data** for our **processing**, but you need the data to establish, exercise or defend legal claims; or
- you have objected to **processing** because you believe that your interests should override our legitimate interests.

➤ Right to erasure

You can ask us to erase your **personal data** where:

- you do not believe that we need your data in order to **process** it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally **process** your data;
- you object to our **processing** and we do not have any legitimate interests that allow us to continue to **process** your data;



- your data has been **processed** unlawfully or have not been erased when it should have been; or
- the personal data have to be erased for compliance with a legal obligation to which we are subject.

➤ Rights in relation to automated decision making (not applicable)

We do not make any automated decisions about you so this right does not apply.

➤ Right to withdraw your consent where processing is based on your consent (not applicable)

We do not **process** your **personal data** based on your consent so this right is not applicable.

➤ Right to data portability (not applicable)

We do not **process** your **personal data** based on your consent or on a contract with us. In that regard, this right is not applicable.

**What will happen if your rights are breached?**

You may be entitled to compensation for damage caused by contravention of the **Data Protection Laws**.

**Complaints to the supervisory authority**

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have **processed** your data in accordance with this notice - you should let us know as soon as possible. You may also complain to the relevant supervisory authority in your country. Information about how to do this is available on each supervisory authority's website as provided below:

ICO: [www.ico.org.uk](http://www.ico.org.uk).

BfDI: [www.bfdi.bund.de](http://www.bfdi.bund.de)

CNIL: [www.cnil.fr](http://www.cnil.fr)