



Privacy Notice

1. Introduction

At MandM Direct, we're committed to protecting and respecting everyone's privacy. This is true for our customers and staff, as well as anyone who applies to work for us via this website.

Please note that this site is hosted and managed on our behalf by ITS Software Systems trading as Eploy. As such, we act as Data Controller, and are therefore responsible for ensuring that all personal data about job applicants that is collected for us, is treated in the strictest confidence. To help provide you with that assurance, we have produced this Privacy Notice which describes the ways in which we use applicants' information, and outlines the legal rights that are available to you.

If you have any questions about this website, or our use of your data, please contact our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com or by post at **Data Protection Officer, MandM Direct, Clinton Road, Leominster, Herefordshire HR6 0SP, United Kingdom.**

2. What information do we collect about you?

If you apply to work for us, we'll collect a range of information from you, including your name, home address, date of birth, e-mail address, telephone number and employment history. This is known as your "Personal Data".

We'll also collect some more sensitive information from you (known as "Special Category Data") which includes your racial or ethnic origin and any medical issues which you may have. Please be advised that we treat all Special Category Data with extra security, which includes ensuring that only authorised individuals are able to access it. This is additional to the technical controls that are routinely applied to all data, as described in section 6 below.

Data will be collected from you as you complete your application on this site, or if you correspond with us by telephone, e-mail or letter.

Please note that should you be successful in your application, all this data may form part of your employment record.

Please also be advised that when you visit this website, and even if you do not make a job application, cookies may be used to collect information about you. For further information, please refer to our Cookies Policy.

3. How will we use your information?

We use the data collected from you for the specific purposes listed in the table below. Please note that this table also explains:

- the lawful basis for processing your data, linked to each processing purpose;
- in what circumstances your personal data will be shared with a third-party organisation; and
- for how long we keep customer data.

Data that is collected by cookies is not included in the table below, but is explained in our Cookies Policy.

Purpose for processing data	Lawful basis for processing data	Third party organisations with whom data is shared	Data retention period
<p>To allow applicants to create an online account and make relevant job applications using this website. This includes capturing some Special Category Data relating to an applicant's ethnicity and criminal history if any</p>	<p>To fulfil contractual obligations which includes taking action before entering into a contract</p> <p>Additionally, where Special Category Data is collected, this is to (i) ensure quality of opportunity in the case of ethnicity and criminal history, or (ii) enable assessment of working capacity in the case of medical data</p>	<p>ITS Software Systems who provides the Eploy system</p>	<p>A user account will remain open and available until an applicant wishes to close it</p> <p>However, unsuccessful job applications will be kept no longer than 6 months. Successful applications will be retained for a maximum of 6 years after employment ends</p>
<p>To liaise with applicants by email, phone or SMS text: this includes updating applicants on the progress of their application, or organising a telephone or face-to-face interview</p>	<p>To fulfil contractual obligations which includes taking action before entering into a contract</p>	<p>ITS Software Systems who provides the Eploy system</p>	<p>Unsuccessful applications will be kept no longer than 6 months. Successful applications will be retained for a maximum of 6 years after employment ends</p>

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<p>To better understand applicants' reasoning skills and personality via independent assessment</p>	<p>To fulfil contractual obligations which includes taking action before entering into a contract</p>	<p>Psychometric and reasoning testing is conducted via Test Candidates</p>	<p>Data relating to unsuccessful applications will be kept no longer than 6 months. Successful applications will be retained for a maximum of 6 years after employment ends</p>
<p>To make reasonable adjustments for applicants at interview where appropriate</p>	<p>Legal obligation under the Equality Act 2010</p>	<p>ITS Software Systems who provides the Eploy system</p>	<p>Data relating to unsuccessful applicants will be kept no longer than 6 months. Records for successful candidates will be retained for a maximum of 6 years after employment ends</p>
<p>To notify applicants that they have been unsuccessful or to make an offer of employment</p>	<p>Legal obligation under the Offer of Employment (section 1), Employment Rights Act</p>	<p>ITS Software Systems who provides the Eploy system</p>	<p>Data relating to unsuccessful applicants will be kept no longer than 6 months. Records for successful candidates will be retained for a maximum of 6 years after employment ends</p>
<p>Following a job offer, to check a successful candidate's Legal Right to Work</p>	<p>Legal obligation under the Immigration, Asylum and Nationality Act 2006 and Article 6(1)(b) Immigration Restrictions on Employment Order 2007/3290</p>	<ul style="list-style-type: none"> ● ITS Software Systems who provides the Eploy system ● Data is shared with the Home Office on request for validation purposes 	<p>Data relating to unsuccessful applicants will be kept no longer than 6 months, whilst records for successful candidates will be retained for a minimum 2 years</p>

<p>To contact a successful candidate's chosen referees</p>	<p>To fulfil contractual obligations which includes taking action before entering into a contract</p>	<ul style="list-style-type: none"> • ITS Software Systems who provides the Eploy system • Basic details will be shared with a candidate's chosen referees for identification purposes 	<p>Data relating to unsuccessful applicants will be kept no longer than 6 months. Records for successful candidates will be retained for a maximum of 6 years after employment ends</p>
<p>To match the details of unsuccessful applicants, and contact them in relation to any suitable vacancies which may arise</p>	<p>Consent</p>	<ul style="list-style-type: none"> • ITS Software Systems who provides the Eploy system 	<p>Data relating to unsuccessful applicants will be kept no longer than 6 months</p> <p>However, applicants can opt in to receive job alerts, which are independent of previous applications, and from which they may unsubscribe at any time</p>

4. Overseas transfers

The data that MandM Direct collects, processes and stores about job applicants is retained and/or accessed from within the UK and/or European Economic Area ("EEA") only.

5. Your rights

Under the terms of data protection legislation, you have the following rights as a result of using this website:

5.1 Right to be informed

This Privacy Statement, together with our Cookies Policy, fulfils our obligation to tell you about the ways in which we use your information as a result of you using this website.

5.2 Right to access

You have the right to ask us, in writing, for a copy of any personal data that we hold about you. This is known as a "Subject Access Request". Except in exceptional circumstances

(which we would discuss and agree with you in advance), you can obtain this information at no cost. We will send you a copy of the information within 30 days of your request.

To make a Subject Access Request, please email our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com.

5.3 Right to rectification

If any of the information that we hold about you is inaccurate, you can either:

- log into your website account where you can make changes to some of the information that we hold about you; or
- contact our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com. Any corrections that you request will be made as soon as possible, and certainly no later than 30 days following your request.

5.4 Right to be forgotten

You can ask that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days. For further information, please contact our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com.

5.5 Right to object

You have the right to object to:

- the continued use of your data for any purpose listed in section 3 of this Privacy Statement for which consent is identified as the lawful basis of processing (i.e. you have the right to withdraw your consent at any time); or
- the continued use of your data for any purpose listed in section 3 of this Privacy Statement for which the lawful basis of processing is that it has been deemed legitimate.

To exercise your right to object, please contact our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com.

5.6 Right to restrict processing

If you wish us to restrict the use of your data because (i) you think it is inaccurate but this will take time to validate, (ii) you believe our data processing is unlawful but you do not want your data erased, (iii) you want us to retain your data in order to establish, exercise or defend a legal claim, or (iv) you wish to object to the processing of your data, but we have yet to determine whether this is appropriate, please contact our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com.

5.7 Right to data portability

If you would like us to move, copy or transfer the data that we hold about you to another organisation, please contact our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com.

Please be advised that this only applies to certain data which has been submitted by you electronically for specific purposes only. Our Head of Compliance and Data Protection Officer can provide further advice.

5.8 Rights related to automated decision-making

Please be assured that no decisions are made about applications to MandM Direct based on automated processes or algorithms.

6. **Data privacy and security**

As described in section 1 above, this website is hosted and managed on behalf of MandM Direct by ITS Software Systems trading as Eploy.

Eploy holds the IASME (Information Assurance for Small and Medium Enterprises Consortium) Certification, providing independent assurance that its data processing systems are secure. Additionally, all data submitted to this website is encrypted both in transit and at rest.

7. **Disclaimers**

Every effort is made to ensure that the information provided on this website, and in this Privacy Statement, is accurate and up-to-date, but no legal responsibility is accepted for any errors or omissions contained herein.

We cannot accept liability for the use made by you of the information on this website or in this Privacy Statement, nor do we warrant that the supply of the information will be uninterrupted. All material accessed or downloaded from this website is obtained at your own risk. It is your responsibility to use appropriate anti-virus software.

This Privacy Statement applies solely to the data collected by us, and therefore does not also apply to data collected by third party websites and services that are not under our control. Furthermore, we cannot be held responsible for the Privacy Statements on third party websites, and we advise users to read these carefully before registering any Personal Data.

8. **Accessibility**

We are committed to providing a website in which content is accessible to everyone. We therefore update our website regularly in order to make it as adaptable as possible.

For example, users can control the text size of each page within their browser. On a PC, holding the "Ctrl" key while pressing the "+" (plus) key will increase text size, and holding the "Ctrl" key while pressing the "-" (minus) key will decrease the text size.

9. General

Comments regarding this Privacy Statement are welcomed, and should be sent to our Head of Compliance and Data Protection Officer at privacy@mandmdirect.com.

You can also contact our Head of Compliance and Data Protection Officer if you have any concerns or complaints about the ways in which your Personal Data has been handled as a result of you using this website.

Alternatively, you have the right to lodge a complaint with the Information Commissioner's Office ("ICO") who may be contacted at Wycliffe House, Water Lane, Wilmslow SK9 5AF or <https://ico.org.uk>.

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