

Privacy Notice - Recruitment

Under this privacy notice (hereinafter the “**Notice**”), Exide Technologies and its affiliates worldwide (together hereinafter “**Exide**”, “**We**” or “**Us**”) informs you what personal data (information) we will hold about you, how we collect it and how we will use and may share information about you during the recruitment application process. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice when we collect or process personal information about you.

1 Identity and Contact Details of Us and of Our Data Protection Officer

Our contact details are: Exide Technologies – GDPR Country Representative:

Sharon Cottam
Vice President Human Resources
sharon.cottam@exide.com
Mansell House, Aspinall Close, Middlebrook,
Horwich, Bolton, BL6 6QQ,
United Kingdom

If a Company data protection officer is identified this will be confirmed at a later date.

2 Categories of Personal Data, Purpose, Legal Basis and Retention

2.1 Categories of your Personal Data and purposes of Our processing

We may process the following categories of your Personal Data: Please see appendix 1 regarding information we collect and hold, why we collect it and how we will use it.

2.1.1 HR-related Personal Data:

- (i) Your basic employee data (e.g. name, home telephone number, mobile, address, email address)
- (ii) Details of your spouse/partner and dependents;
- (iii) Details of your qualifications, experience, job history, titles, salary and working hours and interests
- (iv) Information regarding your criminal record (where processing is authorized by Union or Member State Law)
- (v) Your nationality and immigration status and related documents, such as your passport or other identification and immigration information.
- (vi) Payroll, compensation and benefits;
- (vii) Training records;
- (viii) A copy of your identity – passport, ID card, photo
- (ix) Your career history – positions held, titles, company name
- (x) Your racial or ethnic origin, sex, religious or similar beliefs (where processing is authorized by Union or Member State Law)
- (xi) Health information (as part of any pre-employment medical checks)
- (xii) References – (as part of any pre-employment reference checks)

2.1.2 Business-related Personal Data:

- (i) Your basic business contact details (e.g. name, business telephone number, dial-in data, business email address);
- (ii) Your business card

2.1.3 IT and security-related Personal Data:

- (i) Your computer-related Personal Data (eg. IP address). If you send a CV by email.

2.2 Purpose of Our processing of your Personal Data

We use your Personal Data for the following purposes of processing:

- 2.2.1** Your Personal Data under Section 2. is processed for our legitimate interests such as recruitment. The appendix sets out in Part A the information we collect and hold up to and including the short listing stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared
- 2.2.2** Table B of the appendix summarizes the additional information we may collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared
- 2.2.3** We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Do we make automated decisions on you?

We **do not** make any automated decisions solely on automatic processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

2.3 How we collect your information relating to your personal data

We may collect your personal data from you, your CV, your recruitment agency, your external profile located on sites such as LinkedIn. Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents.

2.4 Retention periods

We keep your personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes of which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims (as extended to take account of early conciliation) after which they will be destroyed. If there is a clear business reason for keeping recruitment records longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised and the longer period for which they will be kept. If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our privacy notice for our employees, contractors.

3 Transfer of Personal Data to Third Parties**3.1 Transfer of your Personal Data to third parties**

Information may be held at our offices and those of our group companies and 3rd party agencies, service providers, representatives and agents as described above. Information may be transferred internationally to our group companies in the US and EMEA. Countries that do not have data protection laws equivalent to those in the EEA we will ensure we

have appropriate security measures in place to ensure that there is appropriate security for information we hold. We endeavor to take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Notice. The recipient of the information will be bound by confidentiality obligations.

4 Your Rights

Under applicable data protection laws, you have rights

- of access to, obtaining a copy of, rectification of, and/or erasure of your Personal Data;
- to restrict or object to its processing; and
- (in some circumstances) to require certain of your Personal Data to be transferred to you or a third party, which you can exercise by contacting Us at the details set out at the beginning of this Notice.

Please note that in some countries, local national law might provide data subjects with supplemental rights.

You can contact Human Resources if you would like to correct or request access to your data that we hold relating to your or if you have any questions about this notice.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable body of a suspected data security breach where we are legally required to do so.

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APPENDIX
ABOUT THE INFORMATION WE COLLECT AND HOLD DURING THE RECRUITMENT
PROCESS

Part A
Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you; recruitment agent ; external profile eg linked in	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles, salary and working hours and interests)	From you, in the completed application form and interview notes (if relevant) ; recruitment agent, external profile eg linked in	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details
Your name, contact details and details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant) ; recruitment agent, external profile eg linked in	Legitimate interest: to carry out a fair recruitment process Legitimate interest: if you are unsuccessful in your application, your details may be passed on to an associated company to see if they have any suitable vacancies	To see whether an associated company has any suitable vacancies
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs (when processing is authorized by Union or Member State Law)	From you, recruitment agent	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment). This may not be relevant in all EU countries	To comply with any equal opportunity policies
Information regarding your criminal record (when processing is authorized by Union or Member State law)	From you	To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process]	To carry out a fair recruitment process Information shared with relevant managers, HR personnel and the referee

Part B

Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers	From your referees (details of whom you will have provided) ; also from recruitment agents ; external profiles eg linked in	Legitimate interest: to make an informed decision to recruit Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications	From you, from your education provider; from the relevant professional body, if applicable ; recruitment agent ; external profile eg linked in	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record (when processing is authorized by Union or Member State law)	From you	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you For reasons of substantial public interest (preventing or detecting unlawful acts,[suspicion of terrorist financing or money laundering in the regulated sector] and protecting the public against dishonesty)	To make an informed recruitment decision]
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you ; external agents	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with country governmental bodies
A copy of your driving license and or passport / photograph	From you or via an external agency	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving license Information may be shared with our insurer