

UTRACK SOFTWARE SOLUTIONS
RECRUITMENT AND JOB APPLICATIONS
DATA PROTECTION NOTICE

1. PURPOSE AND SCOPE OF NOTICE

This notice is intended to explain how your Personal Data will be handled by Autonomy Ltd (t/a uTrack Software Solutions) ("**uTrack Software Solutions**", the "**Company**", "**we**" and "**us**") and sets out the information including the personal information detailed below relating to you ("**Personal Data**") that will be collected and processed by uTrack Software Solutions where:

- You participate in a uTrack Software Solutions recruitment initiative;
- You voluntarily submit your CV to a representative of uTrack Software Solutions on an ad hoc basis;
- You apply for an advertised job (whether as an employee or non-employee of uTrack Software Solutions);
- A recruiter provides your CV to uTrack Software Solutions
- uTrack Software Solutions finds your CV / details in online searches e.g. LinkedIn

For the purposes of this notice, the controller of your Personal Data is uTrack Software Solutions.

This notice applies to any and all job applications submitted and recruitment initiatives co-ordinated by us. If you have any questions or concerns about this notice, please contact our HR Officer at Bianca.fatu@utrack.com.

IMPORTANT: where we receive your CV via a recruiter with whom you have engaged with, we encourage you to read the relevant recruiter's data protection notice to understand how your Personal Data is processed by such a recruiter who is a controller of your Personal Data independently of uTrack Software Solutions.

2. APPLICATION OF THIS NOTICE

This notice applies to the way we collect and process your Personal Data from the time you provide Personal Data in an application, up to the point at which it is decided not to continue with your application to us or you commence employment with us (if applicable). Once you commence employment, the way we process your Personal Data will no longer be dealt with under this notice but will instead be governed by our Staff Data Protection Notice (which will be made available to you when you commence your employment with uTrack Software Solutions).

3. WHAT PERSONAL DATA WE PROCESS

As part of the recruitment and job application process, we collect the Personal Data that you / your agency / your referrer submit to us, which may include:

- Personal details such as your name, gender, residential address, email address, contact telephone numbers, nationality, marital status;
- Details about your previous employment such as your length of service and your role;
- Details about your qualifications such as your skills, education, the languages you speak (including your proficiency), your eligibility to work in a particular country (e.g. your citizenship or visa details), your experience in the job you apply for and other industries;
- Details about your preferences such as positions you may be interested in, information about when you may be available to interview and/or start work for uTrack Software Solutions (i.e. your current notice period) or work on ongoing basis (e.g. full or part time or on weekends), whether you are open to relocation or working remotely, whether you are willing to travel for work and whether you have your own transport;
- Details you may provide us in response to our queries or questions at interview stage (including information about you which we generate throughout the interview and/or recruitment process);

- Results of psychometric, aptitude and pre-employment medical tests which we may ask you to undergo as part of our recruitment process;
- Details about you which we gather from publicly available sources over the internet and your social media accounts where such searches are relevant to the job you have applied for within uTrack Software Solutions.

If you apply for a position through LinkedIn, we may use the information you have previously provided to LinkedIn to populate your application.

It is necessary for us to process your Personal Data in order to assess your job application and/or include you in a recruitment initiative. Ultimately, it may also be necessary for us to process your Personal Data in order to take steps to offer and enter into a contract of employment with you.

In the event that you do not wish to provide us with your Personal Data for the purposes outlined in this notice, we will not be able to assess your job application and/or include you in a recruitment initiative and/or offer you a contract of employment.

Please note that should you include information you think is relevant to your job application or the recruitment initiative, including cover letters, references from your previous employers and other documents that are likely to contain your Personal Data, we will hold and process any such Personal Data in accordance with the terms of this notice.

4. WHY WE PROCESS YOUR PERSONAL DATA

The following table details the key context for which ("**Legal Basis**") and why ("**Purposes**") we collect, obtain and process your Personal Data within uTrack Software Solutions. The third parties and those within uTrack Software Solutions with whom we may share your Personal Data ("**Recipients**") are detailed in section 5 (*Disclosure of your Personal Data*) of this notice.

LEGITIMATE INTERESTS	
Legal Basis	We may obtain, collect and process your Personal Data where it is necessary for the purpose of facilitating the recruitment process.
Purposes	<p>We obtain, collect and process your Personal Data:</p> <ul style="list-style-type: none"> • To process your job application, including to contact you in relation to interviews and/or offer you a job after the interview stage; • To assess your Personal Data against vacancies which we think may be suitable for you; • To verify details you have provided to us using third party sources; • To request information from third parties such as qualifications and references; • To carry out background checks; • To retain your information (should you be unsuccessful) in order to contact you in relation to future vacancies within uTrack Software Solutions that may be of interest to you; • To maximise the number of potential candidates who are informed about job opportunities; • To collect feedback on and evaluate the recruitment process; and • To promote internal and external recruitment events.
IMPORTANT	<p>When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).</p> <p>You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.</p>

COMPLIANCE WITH A LEGAL OBLIGATION	
Legal Basis	It is necessary to process your Personal Data in order to comply with legal obligations imposed on us as an employer under applicable Irish and European Union law.
Purposes	We obtain, collect and process your Personal Data in order to comply with the following legal obligations: <ul style="list-style-type: none"> • To comply with Irish and European Union employment, equality and health & safety law; • To comply with Irish and European Union tax law; • To comply with other applicable Irish and European Union laws
ASSESSMENT OF YOUR WORKING CAPACITY	
Legal Basis	It is necessary to process your Personal Data in order for us to determine your working capacity.
Purposes	We obtain, collect and process your Personal Data: <ul style="list-style-type: none"> • To assess if you are fit to work or not fit to work (e.g. where you suffer from a health condition which may affect your work capacity); • To assist you obtain adequate support after/during you have suffered from a health condition which may affect your ability to attend for interview.

We will only use your Personal Data for the purposes for which we collect it (as outlined in this section 4), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you in accordance with section 9 of this notice and we will explain the legal basis which allows us to do so.

5. DISCLOSURE OF PERSONAL DATA

We may disclose some or all of your Personal Data to the following parties:

- Internal business units such as Human Resources, IT, Finance/Payroll, Managers, system administrators and support staff who have advertised a vacancy within their unit or who will interview you;
- Your previous employers where you have provided them as a reference;
- Recruitment agencies;
- Outsourced service providers who assist uTrack Software Solutions with recruitment initiatives and campaigns such as recruitment agencies, psychometric testers, medical assessors; and
- Professional advisors such as legal advisors, consultants and accountants;

6. TRANSFER OF YOUR PERSONAL DATA

We transfer your Personal Data outside the European Economic Area ("EEA"). Certain of the parties listed in section 4 who process your Personal Data on our behalf may also transfer your Personal Data outside the EEA. In either case, these transfers may be to a country that does not offer the same level of protection that is required by EU data protection law. Where such transfers occur, it is our policy that: a) they do not occur without our prior written authority; and b) that an appropriate transfer agreement is put in place to protect your Personal Data.

If you would like to find out more about any such transfers, please contact our Data Protection Representative whose details are set out in Section 9 of this notice.

7. RETENTION OF YOUR PERSONAL DATA

Where you are a **successful job applicant**, the Personal Data generated by us and provided by you over the course of the job application/recruitment process will be retained by us for the purpose of your contract of employment. Such Personal Data will be retained in accordance with our Staff Data

Protection Notice and Retention Policy (which will be available to you when you commence employment).

Where you are an **unsuccessful job applicant**, we will retain your Personal Data for a period of up to **12 months** after it is determined that your application has been unsuccessful for the purposes of both contacting you in relation to future vacancies within uTrack Software Solutions which we think may be of interest to you and, for the purpose of defending any potential employment equality claims.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

8. YOUR RIGHTS AND HOW TO EXERCISE THEM

You have a number of rights in relation to your Personal Data, which are set out in this section 8. **In particular, these rights include the right to object to processing of your Personal Data where that processing is carried out for our legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right of Access	You have the right to request a copy of the Personal Data held by us about you and to access the information which we hold about you. We will charge you for making such an access request where we feel your request is unjustified or excessive.
Right to Rectification	You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see below) and we do not have an overriding reason to process your Personal Data or if we no longer require your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask us to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data we hold about you is inaccurate or our use of your information is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Data Portability	You may request us to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) we process your Personal Data with your consent or where it is necessary to perform our contract with you; and (2) the processing is carried out by automated means.
Right to Object	You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.

You can exercise any of these rights by submitting a request to our HR Officer in writing.

9. QUESTIONS REGARDING THIS NOTICE

If you have any concerns about the way your Personal Data are being used or processed by uTrack Software Solutions, please contact our HR Officer.

If after this, you are not satisfied by the effort and response by uTrack Software Solution, you have the right to lodge a complaint with the Data Protection Commission. Please see www.dataprotection.ie for further information.

10. CHANGES TO THIS NOTICE

If we amend this notice, in whole or part, at our sole discretion, any changes will be effective immediately upon notifying the revised notice to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you and you will have a choice as to whether or not we use your Personal Data in the new manner.

If you have questions or concerns about this notice, please contact our HR Officer.