

CROMWELL APPLICANT PRIVACY POLICY

Company Confidential

PRIVACY POLICY RELATING TO CROMWELL APPLICANTS

Date 16th May 2018

1. PURPOSE

The purpose of this policy is to set out how Cromwell collects, uses and shares personal data that identifies or is associated with you ("**personal data**").

2. SCOPE

This policy applies to all Cromwell Applicants.

"**Applicants**" means any individual that has applied for a position with Cromwell, including prospective employees, directors, agency workers, interns, consultants and contractors.

3. POLICY

Cromwell is committed to protecting the personal data of its Applicants. Please take a few minutes to read this policy carefully as it contains important information relating to your personal data.

3.1. Data controller

A list of Cromwell companies that this policy applies to can be found at **Appendix 1**. The Cromwell company to which you submit your application will be the data controller of your personal data, and references to "**Cromwell**", "**we**", or "**us**" in this policy are references to that company.

If you are unsure which Cromwell company you are applying to, please contact the Recruitment Team using the contact details at the end of this policy.

3.2. What personal data does Cromwell collect and how is it used?

Cromwell collects and processes personal data about you when you voluntarily submit information directly to us, such as your name, address, gender, marital status, emergency contacts, references, education details, job & remuneration details (including previous employment history). When we collect such information from you, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we may be unable to process your application.

If we decide to offer you employment, we may also collect personal data about you from other parties, such as information provided by your referees and the results of any background checks against public or government databases.

Cromwell may also create and maintain internal records which may contain personal data about you, such as interview evaluation notes.

In all cases, data held by us will only be used consistent with the relevant and applicable legal requirements of the country in which the personal data is collected.

The table in **Appendix 2** sets out the categories of personal data we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal data and information as to how we determine applicable retention periods.

3.3. How is the personal data stored?

We implement appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, change or damage. All personal data we collect will be stored on secure servers.

3.4. How long will my personal data be stored for?

The table in Appendix 2 sets out how we determine the applicable retention periods. If your application is successful and you become an employee or independent contractor of Cromwell, the personal data we collect during the application process may be transferred to your personnel file and stored in accordance with our Team Member Privacy Policy. We will give you a copy of this policy at the start of your employment with Cromwell.

3.5. Where is the personal data stored and processed?

Personal data may be transferred to the USA and other countries where the data protection regulations are less stringent than in the European Economic Area ("EEA"). We will ensure that any party to whom your data may be transferred outside of the EEA commits to providing the same level of protection for your data as it would have received had it remained in the EEA. To that end, we are party to an intra group agreement with W.W. Grainger, Inc. ("**Grainger**") governing the transfer and protection of any personal data transferred to Grainger in the USA. This agreement contains standard contractual clauses approved by the European Commission for the transfer of personal data.

If you wish to enquire further about the safeguards used, please contact the Recruitment Team using the contact details at the end of this policy.

3.6. Who we share your personal data with

We may need to transfer some of your personal data to the following third parties in connection with the operation of our business or to comply with our obligations to regulators, government entities, law enforcement authorities or others:

- (a) **Our parent company:** personal data may be transferred to Grainger in connection with:
 - the provision of centralised human resources management;
 - group business planning, budgeting, reporting and strategy;
 - group-level legal and regulatory compliance and managing associated risks, providing legal advice and in connection with potential or actual litigation;
 - reporting, assessing and responding to claims for risk management.

- (b) **Service providers and advisors.** Third party vendors and other service providers that perform services for us or on our behalf, which may include providing mailing or email, tax and accounting, payments and payroll processing and travel booking services. Such data may be disclosed in connection with:
 - managing the application process;
 - storing the results of various application processes to assess the suitability of applicants for a role;
 - the provision of centralised human resources management;
 - the provision of centralised IT infrastructure;
 - legal and regulatory compliance and managing associated risks, including providing legal advice in connection with potential or actual litigation.

- (c) **Law enforcement, regulators and other parties for legal reasons.** Third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) comply with legal process; (iii) receive legal advice; (iv) respond to requests from public or government authorities, including public or government authorities outside your country of residence; (v) detect and investigate illegal activities and breaches of agreements; (vi) exercise or protect the rights, property, or personal safety of Cromwell, our team members or third parties.
- (d) **Third parties you request or consent we disclose certain personal data to,** such as banks if you apply for a mortgage or another employer if you seek a reference from us.
- (e) **Other Team Members at Cromwell,** where such disclosure is necessary for the assessment of your application, such as members of the HR team or IT support staff.

3.7. Consent

We may need your consent for some uses of certain personal data.

If we need your consent, we will notify you of the personal data we intend to use and how we intend to use it.

You do not have to give us consent. Where you have given us consent to collect, use or disclose your personal data in a certain way, you may withdraw your consent at any time. If you wish to withdraw any consent that you have given us, please contact the Recruitment Team using the contact details at the end of this policy.

3.8. Access to your personal data

All Applicants have the following rights in respect of your personal data that we hold:

- (a) **Right of access.** You have the right to obtain:
 - (i) confirmation of whether, and where, we are processing your personal information;
 - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
 - (iii) information about the categories of recipients with whom we may share your personal information; and
 - (iv) a copy of the personal information we hold about you.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
- (c) **Right to rectification.** You have the right to obtain rectification of your personal data without undue delay where that personal data is inaccurate or incomplete.
- (d) **Right to erasure.** You have the right to obtain the erasure of your personal data without undue delay in certain circumstances, such as where the personal data is no longer necessary in relation to the purposes for which it was collected or processed.
- (e) **Right to restriction.** You have the right, in certain circumstances, to require us to limit the purposes for which we process your personal data if the continued processing of that personal data in this way is not justified, such as where the accuracy of the personal data is contested by you.
- (f) **Right to object.** You have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.

If you wish to exercise one of these rights, please contact the Recruitment Team in writing using the contact details at the end of this policy.

Requests will be responded to within the timeframe set out in relevant local data protection legislation.

You also have the right to lodge a complaint to the Supervisory Authority in your country of residence. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

Further enquiries

If you have any questions about this policy, please contact the Recruitment Team at recruitment@cromwell.co.uk.

Appendix 1

Cromwell Entities this Policy Applies to

- Cromwell Group (Holdings) Ltd
- Cromwell Tools Ltd
- Merlin Business Software Ltd
- AJ Howard Industrial Supplies Ltd
- GTSS Engineers Supplies Ltd
- Tooling & Engineering Distributors Ltd (Ireland)
- Cromwell Poland Sp. Z o.o
- Cromwell Tools Ltd Hungary
- CROMWELL TOOLS SRL (Romania)
- Cromwell Czech Republic s.r.o.
- Cromwell France
- Cromwell South Africa Ltd
- Cromwell Thailand
- TECHNO TOOLS & EQUIPMENT SDN BHD (Malaysia)
- PT Cromwell Tools (Indonesia)
- Cromwell Industrial Supplies Pvt Ltd (India)

Appendix 2

Personal data we collect

Category of personal data	How we use it	Legal basis for the processing	Retention period
Personal contact details , such as your title, first name, last name, personal email, home address and telephone number.	We use this information to open and maintain applicant records.	The processing is necessary for our legitimate interests, namely managing applications for positions with Cromwell.	Up to 2 years from the later of: (1) any decision with respect to your application, (2) any decision with respect to any subsequent application; and (3) the date you last updated or logged into your profile.
	We use this information to communicate with you as part of the recruitment process.	The processing is necessary for our legitimate interests, namely communicating with applicants and managing job applications for positions with Cromwell.	
	We use this information to conduct identity and background checks with your consent.	We will use your personal data in this way to the extent you have given us consent to do so.	
Job application information , such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience, CV.	We use this information to process applicants' applications, including assessing applicants' suitability for a role.	The processing is necessary to take steps prior to entering into a contract.	Up to 2 years from the later of: (1) any decision with respect to your application, (2) any decision with respect to any subsequent application; and (3) the date you last updated or logged into your profile.
	We use this information to monitor and improve our application process.	The processing is necessary for our legitimate interests, namely managing applications for positions with Cromwell.	
	We use this information to calculate proposed salary and assessing eligibility for benefits.	The processing is necessary to take steps prior to entering into a contract.	
Nationality, citizenship and right to work information , such as country of birth, government identification documents (including passports and residency permits) and, where relevant, visa information.	We use this information to determine your eligibility to work.	The processing is necessary for compliance with a legal obligation to which we are subject.	Up to 1 year from any decision with respect to your application.
	We use this information to fulfil our obligations to relevant government authorities.	The processing is necessary for compliance with a legal obligation to which we are subject.	
Results of reference checks and screening , such as verification of education and employment history other checks applicable to the job role applied for.	We use this information to process applicants' applications, including assessing applicants' suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract.	Up to 1 year from any decision with respect to your application.
	We use this information to fulfil our obligations under applicable law, regulations, legal processes or enforceable government requests.	The processing is necessary for compliance with a legal obligation to which we are subject.	
Results of background checks , such as	We use this information to determine	We will only process this personal information	Up to 1 year from any

criminal records checks and other searches relevant to the role for which you are applying.	applicants' eligibility for certain benefits (such as a company car).	to the extent that you have given us your explicit consent to do so.	decision with respect to your application.
Interview evaluation and appraisal information , such as comments and notes made by interviewers or other Cromwell team members in connection with your application or the outcome of psychometric assessments.	We use this information to process applicants' applications, including assessing applicants' suitability for a role.	The processing is necessary for our legitimate interests, namely managing applications for positions with Cromwell and managing our human resources.	Up to 1 year from any decision with respect to your application.
	We use this information to calculate proposed salary and to assess eligibility for certain benefits.	The processing is necessary in order to take steps prior to entering into a contract.	
	We use this information to monitor and improve our application process.	The processing is necessary for our legitimate interests, namely assessing and managing applications for positions with Cromwell.	
Any other data provided by you in the course of the application process , including electronic communications with you in relation to the application process.	We use this information to process applicants' applications, including assessing applicants' suitability for a role.	The processing is necessary to take steps prior to entering into a contract;	Up to 1 year from any decision with respect to your application.
	We use this information to monitor and improve our application process.	The processing is necessary for our legitimate interests, namely managing applications for positions with Cromwell and managing our human resources.	