

This Privacy Policy explains how we handle personal data about (a) people who visit our website and careers pages and (b) individuals who apply for jobs with us. We are committed to protecting your privacy and processing your data in accordance with applicable laws, including the UK GDPR and EU GDPR.

1) Who We Are

Controller: CEMA

Contact for privacy queries: pwright@cemaltd.co.uk

Postal address: The White House, Wollaton Street, Nottingham, NG1 5GF

Data Protection Officer (if applicable): pwright@cemaltd.co.uk

2) The Data We Collect

2.1 Website Visitors

- **Usage & device data:** IP address, browser type/version, device identifiers, pages visited, time spent, referral sources, and interactions.
- **Cookies & similar tech:** Essential cookies (site security, session management), analytics cookies (traffic and performance), and preference cookies. (See **Section 10 Cookies** for details and controls.)
- **Contact forms / newsletter:** Name, email, phone, and the content of your message/consent preferences (if you choose to submit these forms).

2.2 Job Applicants

- **Application data:** Name, contact details, CV/resume, cover letter, work history, qualifications, portfolio/links, desired role/location/salary.
- **Screening information:** Interview notes, assessment results, ability/skills tests, right-to-work documentation, reference details.
- **Special category data (only if requested/required and permitted):** e.g., health/disability information for reasonable adjustments; equal opportunities monitoring (e.g., ethnicity, gender, sexual orientation) collected on a voluntary basis and separated from decision-making.
- **Automatically collected during application:** IP address, device, and activity logs within the application portal/ATS for security and audit.

- **Background checks (if applicable):** Criminal records, credit checks, or sanctions screening—**only** where lawful and necessary for the role, and typically after conditional offer.

3) Why We Use Your Data (Purposes) & Legal Bases

3.1 Website Visitors

- **Provide and secure the site** (security, load balancing, fraud/abuse prevention) – *Legitimate interests; necessary for service* (essential cookies).
- **Analytics and performance** – *Legitimate interests or consent* (for non-essential cookies where required).
- **Respond to enquiries/newsletters** – *Legitimate interests or consent* (for marketing).

3.2 Job Applicants

- **Process and evaluate your application** (screening, interviews, assessments) – *Steps prior to entering a contract and legitimate interests* (to hire effectively).
- **Communicate with you** about roles, timelines, outcomes – *Legitimate interests/contract*.
- **Right-to-work and identity checks** – *Legal obligation*.
- **Diversity & inclusion monitoring** – *Substantial public interest* where applicable or *explicit consent*; stored separately and not used in decisions.
- **Background checks** (role-dependent) – *Legal obligation, legitimate interests, or explicit consent* depending on jurisdiction/role.
- **Talent pool** (future opportunities) – *Consent* (you can opt out anytime).
- **Defend legal claims / maintain records** – *Legitimate interests and/or legal obligation*.

4) How We Collect Data

- **Directly from you** via forms, email, interviews, assessments, or uploaded documents.
- **From third parties** with your authorisation or where lawful: referees, background screening providers, professional networks (e.g., LinkedIn), public registers, and recruitment agencies.
- **Automatically** via our website/ATS (logs, cookies, analytics).

5) How We Share Your Data

We may share your data with:

- **Recruitment and HR tools** (ATS, assessment platforms, scheduling tools).
- **Cloud hosting/IT service providers** (secure infrastructure).
- **Background screening providers** (if applicable and lawful).
- **Professional advisers** (legal, compliance).
- **Recruitment agencies** (if you applied through or consented to agency involvement).
- **Group companies** involved in the recruitment process (where applicable).

All recipients are bound by contracts requiring appropriate confidentiality and security (Data Processing Agreements). We **do not sell** your personal data.

6) International Data Transfers

If we transfer your data outside the UK/EU, we implement appropriate safeguards such as **UK/EU Standard Contractual Clauses**, adequacy decisions, and additional technical/organisational measures. You can request details of applicable safeguards via pwright@cemaltd.co.uk

7) Data Retention

We keep personal data only for as long as necessary for the purposes described and to comply with legal and regulatory requirements. Typical retention periods (customise as needed):

UNCONTROLLED UNLESS VIEWED VIA Q-PULSE

Data Category	Typical Retention
Website analytics (pseudonymous)	13–26 months (per analytics settings)
Enquiry forms	12–24 months
Unsuccessful applications	6–12 months after decision (to respond to queries/legal claims)
Talent pool (with consent)	Up to 24 months or until withdrawal of consent
Interview notes & assessments	Align with application retention (e.g., 6–12 months)
Right-to-work & onboarding records (successful candidates)	Per employment law (often 6 years in the UK for certain records)
Background checks (if performed)	Only for shortest period necessary per law/policy

We will securely delete or anonymise data when retention ends.

8) Your Rights

Depending on your location, you may have the right to:

- **Access** your data; **rectify** inaccuracies; **erase** data (where applicable).
- **Restrict** or **object** to processing (especially where based on legitimate interests).
- **Data portability** (machine-readable copy, where applicable).
- **Withdraw consent** at any time (e.g., talent pool, non-essential cookies).
- **Lodge a complaint** with a supervisory authority (e.g., the UK ICO).

To exercise rights, contact pwright@cemaltd.co.uk We may need to verify your identity before fulfilling requests.

9) Automated Decision-Making & Profiling

We **do not** rely on solely automated decisions that produce legal or similarly significant effects. If we introduce automated screenings (e.g., minimum criteria filters), a human review will be available, and we will provide notice and your rights to contest/seek human intervention.

10) Cookies (Website & Careers Pages)

- **Essential cookies:** Required for security, load balancing, session management.
- **Analytics/performance cookies:** Help us understand site usage and improve the experience.
- **Preferences:** Remember choices like language or cookie settings.

Where required, we obtain consent for non-essential cookies and provide a **Cookie Banner** and **Cookie Settings** to manage preferences. See our **Cookie Policy** for details.

11) Keeping Your Data Secure

We use appropriate technical and organisational measures, such as:

- Encryption in transit and at rest (where applicable)
- Access controls, role-based permissions, and MFA for admin users
- Regular patching, vulnerability management, and logging
- Secure development and data minimisation practices
- Staff confidentiality and privacy training
- Vendor risk management and contractual safeguards

While no system is 100% secure, we work to protect your information and promptly address issues.

12) Children's Data



The collective term 'the organisation' is used to represent the companies stated within the header &/or footer of this document.

Doc No	HR Pol ##	Revision No	1	Revision date	03/03/26	Page 5 of 6
--------	-----------	-------------	---	---------------	----------	-------------

Our careers site and application process are intended for adults. We do not knowingly collect data from children below the minimum legal working age in the relevant jurisdiction.

14) Changes to This Policy

We may update this Privacy Policy from time to time. Changes will be posted here with an updated “**Last updated**” date. If changes are material, we will take appropriate steps to notify you.

15) Contact Us

Questions, requests, or complaints about this policy or your personal data:

Email: pwright@cemaltd.co.uk

Address: The White House, Wollaton Street, Nottingham, NG1 5GF

Supervisory authority (UK): Information Commissioner’s Office (ICO) — you have the right to lodge a complaint.