

PRIVACY NOTICE – JOB CANDIDATES

What is the purpose of this document?

Riso (UK) Ltd is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

Data protection principles

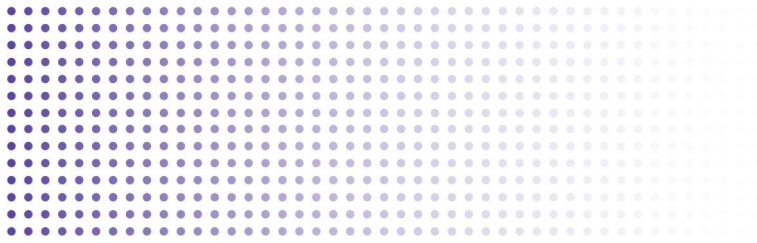
We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Who is your personal information collected from?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Where applicable, recruitment agencies including online recruitment agencies such as Indeed.
- Where applicable, publicly accessible sources such as social media websites (for example Facebook, X, LinkedIn, Instagram) and news websites where we decide to carry out an adverse media check (see further below).



- Where applicable, Disclosure and Barring Service in respect of criminal convictions.
- Your named referees.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, address, telephone number, personal email address, education history, qualifications and employment history
- Any information you provide to us during the interview process.
- Information obtained from sources other than yourself previously referred to in this notice.

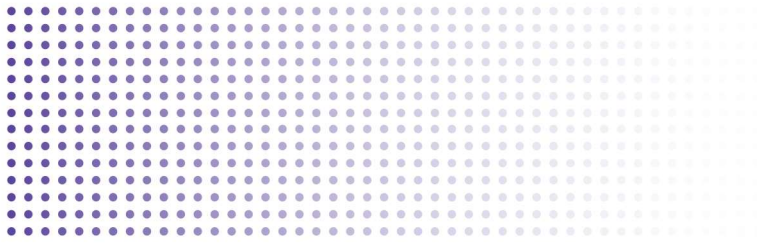
This may involve us collecting, storing and using the following types of more sensitive personal information:

- Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.



It is in our legitimate interests to decide whether to appoint you to a role within our business since it would be beneficial to our business to appoint candidates to vacancies which arise within our business.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your application for a role with our business, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you a role with us. For some roles there may be more than one interview prior to deciding whether to offer you a role. If we decide to offer you a role in our business, we will then take up references, carry out a criminal records check (where applicable to the role) and we may carry out an adverse media check (where applicable to the role) before confirming your appointment.

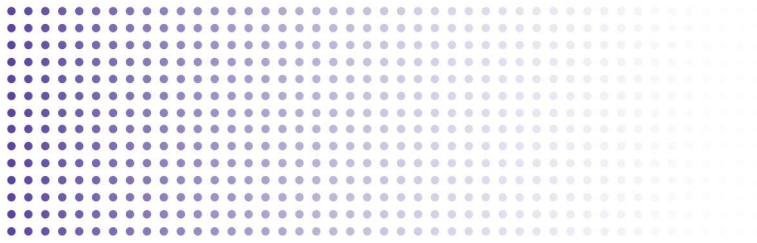
Adverse media checks

Some roles in our business include a requirement to work in schools and similar institutions on an unsupervised basis. As a result, we may carry out an adverse media check after we offer you a role to assess whether there is any information contained in publicly accessible sources which may affect your suitability to work with children. We believe we have a duty of care to check public sources of information about individual appointed to roles which involve working in schools and similar institutions.

We will usually conduct this check by searching for your name and home location within Google.

To ensure that any check is conducted on a fair and reasonable basis, and taking into account that such checks may reveal irrelevant personal information about the candidate, we will ask one member of staff to do the checks, and screen the information for relevancy against the requirements of the role applied for. This member of staff will then pass on only the relevant information to the manager making the recruitment decision.

Wherever possible we will provide candidates with an opportunity to provide further information or comment on the accuracy of the information obtained in adverse media checks. This allows us



to make a fully informed recruitment decision and ensures that we are using the information in a transparent way.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a criminal records check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

Where appropriate we will use your particularly sensitive personal information in the following ways:

- We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made to the interview process.
- We may use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

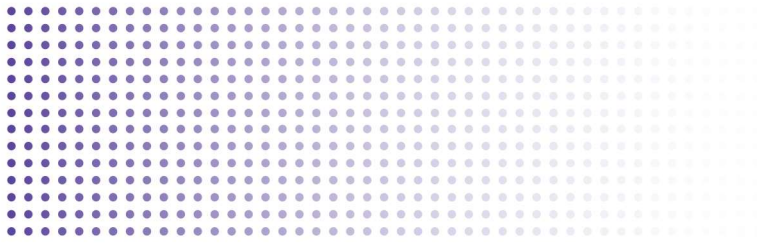
Information about criminal convictions

We envisage that we will process information about criminal convictions where the role you apply for includes a requirement to work in schools or similar settings from time to time. For other roles, we do not envisage processing criminal convictions data.

For certain roles, namely those which involve working in schools, we have a legal right / reason, to undertake Disclosure and Barring Service (DBS) checks. If we choose to carry out an adverse media check, this may also reveal information about criminal convictions. As many of our roles involve working in schools and similar settings on an unsupervised basis, it is necessary for us to ascertain that the persons we employ are suitable to work in such settings.

We will collect information about your criminal convictions history if we would like to offer you a role which includes a requirement to work in schools or similar institutions (conditional on checks and any other conditions, such as references, being satisfactory).

We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role in a school or



similar setting. In particular, roles which involve working in schools on an unsupervised basis are roles which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) and are also included in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233) and therefore eligible for an enhanced check from the Disclosure and Barring Service.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data, which is available on request.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might you share my personal information with third parties?

During the recruitment process, the only individuals who will have access to your personal information are our HR team and the managers within our business who are involved in recruitment decisions.

We will only share your personal information with the following third parties for the purposes of processing your application: Recruitment agencies and our parent company based in Japan.

Details will only be shared with our parent company in Japan where the role to be offered is at the level of senior manager or above.

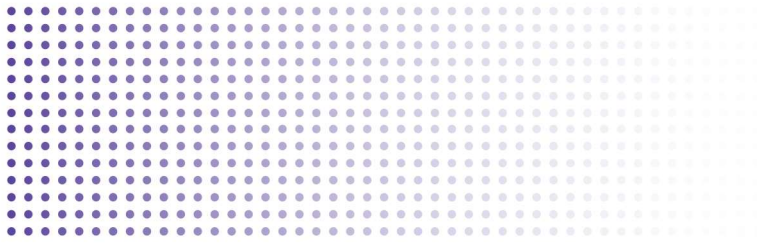
If we offer you a role and require a DBS check, we may also be required to share your data with the Disclosure and Barring Service as appropriate.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will not share your data with any third party which is based outside of the UK save for our parent company based in Japan.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other



third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

Data retention

How long will you use my information for?

Generally, we will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to a role in our business.

We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

Where we carry out an adverse media check, we not keep any records of this once the recruitment process has concluded (for example, any search details or information revealed by a search shall not be retained), we will only keep a record of the decision made.

Where we obtain a check via the Disclosure and Barring Service, we will keep this for 6 months only in line with the guidance issued by the Disclosure and Barring Service on this matter.

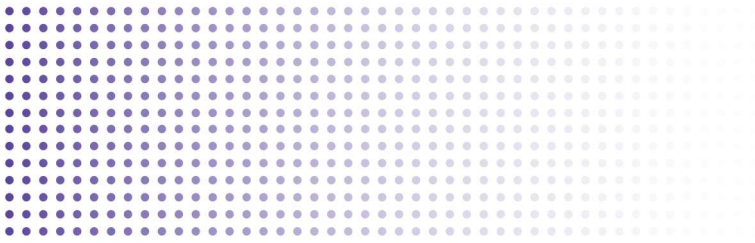
If we would like to retain your personal information on file, on the basis that we might be able to consider you for an opportunity that may arise in future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period for that purpose.

Rights of access, rectification, erasure, objection, restriction and data portability

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as making a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.



- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our HR Team whose contact details are hr@riso.co.uk.

Questions or complaints

If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact our HR Team who have been appointed to oversee compliance with this privacy notice and whose contact details are hr@riso.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK.