

## PRIVACY NOTICE FOR APPLICANTS

Dear applicant,

Protecting your personal data is very important to us. When processing your personal data, we comply with the legal requirements, in particular the Data Protection Act 2018, the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019. In compliance with the legal obligations under the UK GDPR, we are hereby informing you about the data processing activities conducted by us within the scope of your application and your rights and entitlements under data protection laws.

### 1 Who is responsible for data processing and whom can you contact?

The company responsible for data processing (the “Company”) is:

Constantia Sittingbourne Limited  
Eurolink Commercial Park  
Bonham Drive  
Sittingbourne, Kent  
ME10 3RY

You can reach us at:

Wendy Hansford Thompson  
Direct Line: 00 44 1795 419704  
E-Mail: [wendy.thompson@cflex.com](mailto:wendy.thompson@cflex.com)

### 2 What data is processed and from where is it sourced?

We process the personal data that you made available to us as part of your application (e.g. personal information, curriculum vitae) respectively in the course of creating your user account for the registration at our job portal.

Personal data includes with regard to your application in particular:

- Personally identifiable information, in particular personal details (e.g. name, date of birth, place of birth, nationality, gender, title, position)
- Contact and communication data (e.g. address, telephone number, email)
- Remuneration data (e.g. salary expectations)
- Image data (e.g. photo)
- Qualifications data (e.g. CV, education, professional experience, language skills, further training, special knowledge and skills)
- Data on previous employment relationships (e.g. period, name of activity, references)
- If applicable, work permit / residence title

- If relevant for the advertised position: health suitability
- If relevant for the advertised position: Information data such as data on criminal convictions and criminal offenses (e.g. criminal record excerpt).

Personal data includes with regard to your registration for the job portal (user account) in particular:

- Salutation (gender)
- First name, last name
- User name
- E-Mail address
- Country of residence

### 3 For what purposes and on what legal basis is the data processed?

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data are Article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract and Article 6(1)(f) for the purpose of our legitimate interests.

If you provide us with any information about reasonable adjustments, you require under the Equality Act 2010 the lawful basis we rely on for processing this information is Article 6(1)(c) to comply with our legal obligations under the Equality Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious, sexual orientation or ethnicity information are Article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights or Article 9(2)(g) of the UK GDPR.

### 4 Who will receive my data?

We'll use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your application. We may also contact you to request your feedback about our recruitment process. We'll use the other information you provide to assess your suitability for the role.

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it may affect your application if you don't.

We will use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

## 5 Will data be transferred to third countries or an international organization?

Data will only be transferred to third countries (countries outside the EU or the European Economic Area – EEA) if this is necessary for performing your employment relationship, is required by law, or if you have given us your consent.

Moreover, data may be transferred to subsidiaries or data processors of the Company in third countries or subcontractors of data processors of the Company in third countries. They are obligated to comply with EU-wide data protection and security standards.

## 6 How long will my data be stored?

As a rule, we process your personal data for the duration of the application process and – in the event of rejection – for up to six months after completion of the application process (e.g. rejection of your application). This also applies to your registration data (user profile/account including your uploaded documents and application data) on the application platform unless you have uploaded a new application or prolonged the period of use of your profile in the meantime.

*Important notice: In case your country of residence differs from the country where the Company you applied for is located the deletion period of your country of residence will apply for the deletion of your user profile. You can find all the deletion periods in the table below (point 11).*

You can withdraw your application(s) and/or delete your user profile. Please, be aware, that even if you withdraw your application and/or delete your user profile, your application data will be retained in the system for the retention periods as mentioned above. Retaining such application helps us to record that applications were rejected fairly and not due to a bias. However, your application will not be processed further for recruiting purposes.

In the case of your employment, we will include your application documents in your personnel file. We process your personal data, if necessary, for the duration of the entire contractual relationship (from initiating and processing to the termination of the employment contract) and beyond that according to the legal storage and documentation obligations arising from the UK GDPR.

## 7 Other

Your data will not be used for automated decision-making purposes (including profiling).

## 8 Data security

We use technical and organizational security measures to protect your data against manipulation, loss, destruction, and against access by third parties. Our security measures are continuously adapted to technological developments.

## 9 What are my data protection rights?

You have the right to access, rectification, erasure, or restriction of processing and the right to object to the processing and the right to data portability in accordance with the requirements of data protection laws. You can also withdraw your consent to the processing of your data at any time.

Please address any enquiries or requests relating thereto to:

- By email: [wendy.thompson@cflex.com](mailto:wendy.thompson@cflex.com)

If you are of the opinion that the processing of your data violates data protection regulations, we kindly ask you to contact our data protection coordinator ([wendy.thompson@cflex.com](mailto:wendy.thompson@cflex.com)) so that we can clarify your questions.

This does not affect your right to lodge a complaint with the competent supervisory authority. In United Kingdom, this is the following institution:

- ICO Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow, Cheshire  
SK9 5AF  
United Kingdom  
Telephone: +44 303 123 1113  
E-mail: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
<https://ico.org.uk/>

## 10 Am I required to provide data?

To consider your application, we need the personal data from you that are necessary for the decision on the establishment of the employment relationship and, if necessary, the conclusion of the employment contract.

## 11 Deletion Periods (user profile)

In the table below you can find the deletion periods which apply to your user profile (including your data and documents uploaded there) in case your country of residence differs from the country where the Company you applied for is located. However, the deletion periods for your application follow the rules of the Constantia Flexibles Company you applied for and as described under point 6.

<b>Country</b>	<b>Deletion period</b>
Austria	7 months
Belgium	6 months
Czech Republic	6 months
Denmark	6 months
France	6 months
Germany	6 months
Italy	6 months
Mexico	24 months
Netherlands	6 months
Poland	24 months
South Africa	6 months
Spain	12 months
Turkey	12 months
United Kingdom	6 months
United States of America	6 months
Vietnam	6 months
All other countries	6 months

*This Privacy Notice was last updated on 25 April 2024.*