



JENOPTIK | Light & Safety

JENOPTIK Traffic Solutions UK Ltd | Ten Watchmoor Park | Riverside Way | Camberley | Surrey | GU15 3YL | UK

Privacy notice – 25th June 2019

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1. General information

1.1. Controllers contact details

JENOPTIK Traffic Solutions is the controller for the personal information we process, unless otherwise stated.

You can contact us via the following methods:

Via Post:

Jenoptik Traffic Solutions UK Ltd
Ten Watchmoor Park
Riverside Way
Camberley
Surrey
GU15 3YL

Via Phone: +44 (0)1183 130 333

Email: info@jenoptik.co.uk

1.2. Data Protection Officer's contact details

Our Data Protection Officer is Grant Curran. You can contact him at compliance-uk@jenoptik.com or via our postal address. Please mark the envelope for the attention of the 'Data Protection Officer'

1.3. How do we get information?

Personal information we process which will be provided directly by yourselves will be for the following reasons

- You have made an enquiry or complaint to us
- You have made an information request to us
- You have applied for a job or secondment with us
- You are representing your organisation

Other Information we process will be gathered via 3rd parties, i.e. job reference, medical or credit reference.

1.4. Your data protection rights

Under Data protection law, you have rights which we need to make you aware of. The rights available to you depend on our reason for processing your information.

Your right of access

You have the right to ask us for copies of your personal information that we hold. This right always applies. There are some exemptions, which means you may not always receive all the information we process



Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

Your right to erasure

- You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing
- You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing

- You have the right to object to processing of your information in certain circumstances.

Your right to data portability

This only applies to information you have supplied to us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. This right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated

If we are processing your information for criminal law enforcement purposes, your rights are different. Please read the relevant section of the notice.

You are not required to pay a fee for exercising your rights. We have one month to respond to you (which for clarification we have deemed to be 30 calendar days).

However manifestly excessive or unfounded requests can have the following applied to them:

- We can charge a fee that is proportionate to the time spent in dealing with and collating the information of the request.

Or

- We can refuse, which we would notify you off in writing with the reasons why.

Please contact us at compliance-uk@jenoptik.com if you wish to make a request.

1.5. Sharing your information

We will not share your information with any third parties for the purpose of direct marketing.

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

As we are part of the Jenoptik Group, we will share certain information with them in relation the personal data we hold. Where any of the group companies are outside of the EEA these will be covered by binding corporate rules to allow the sharing of information.



In some circumstances we are legally obliged to share information, for example under a court order. We might also share information with other regulatory bodies in order to further their, or our objectives. In any scenario, we will satisfy ourselves that we have a lawful basis on which to share the information and document our decision.

1.6. Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

1.7. Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at compliance-uk@jenoptik.com and we will respond.

If however you remain dissatisfied, you can make a complaint to the UK supervisory authority the ICO using the following web link:

<https://ico.org.uk/make-a-complaint/your-personal-information-concerns/personal-information-concerns/personal-information-concerns-report/>

1.8. Changes to this privacy notice

We keep our privacy notice under regular review to make sure it is up to date and accurate.

1.9. Contacting us

When you call our main switchboard or a direct dial line, our representative may make a note of the number you have called in from if it is not withheld. This will only be used for the purpose of allowing us to make further contact if needed, i.e. should the call be disconnected or if we are required to pass on your details to a colleague to follow up on the conversation. We do not audio-record calls.

Whilst we do not audio-record calls we may take written notes which may be filed in accordance with which purpose they were taken for.

Emailing Us

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with standard security standards. Most webmail platforms such as Gmail and Hotmail use TLS by default.

We also monitor any emails sent to us, including file attachments, for viruses or malicious software. You must ensure that any email you send is within the bounds of the law.

1.10. Visitors to our website

- Analytics
- Cookies
- Search Engine
- Purpose and legal basis for processing
- What are your rights?



Analytics

When you visit www.jenoptik.co.uk, we currently have google analytics, but we do not process any of this information, for more information on how these work, please visit the following link <https://support.google.com/analytics/answer/6004245>

Cookies

We uses cookies within our website which are currently being reviewed to make sure that they are kept in line with current legislations. For more information on the service and our cookies please visit <https://www.civicuk.com/cookie-control>

Search engine

Currently we do not offer a web service search engine.

Purpose and legal basis for processing

The purpose for implementing all of the above is to maintain and monitor the performance of our website and to constantly look to improve the site and the services it offers to our users. The legal basis we rely on to process your personal data is article 6(1)(f) of GDPR, which allows us to process personal data when it is necessary for the purposes of our legitimate interests.

What are you rights?

As we are processing your personal data for our legitimate interests as stated above, you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

1.11. Visitors to the office

We meet visitors at our head office and regional offices, including:

- Customers
- External training providers
- Job applicants
- Suppliers and tradespeople
- Stakeholders

If your visit is planned, we will arrange for your details to be booked into our calendar appointments system to send information to you about the meeting and where it will be held, and you will also be asked to sign in for Health and Safety purposes. If you arrive without an appointment you will be asked to sign in to our visitors' log.

Closed-circuit television is operated at our Cumbernauld office, for which we are the data controllers of. This is used for identifying visitors as they come to the building and for general security purposes. The data retention period is 30 days. The purpose for processing this information is for security and safety reasons. The legal basis we rely on to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when necessary for the purposes of our legitimate rights.



We have Wi-Fi on site for the use of visitors, we will provide you with the address and password. We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received.

We do not ask you to agree to terms, just to the fact that we have no responsibility or control over you use of the internet while you are on site, and we do not ask you to provide any of your personal information to get this service.

2. Reason for contacting us

2.1. Make a web enquiry

Purpose and legal basis for processing

- When you contact us to make an enquiry, we collect information, including your personal data, so that we can respond to it and fulfil our legal obligations.
- The legal basis we rely on to process your personal data is article 6(1)(a) of the GDPR, which allows us to process personal data when the individual has given clear consent to process their personal data.

What we need and why we need it.

- Our online enquiry form will ask for certain personal details from you which will include your name, email address and telephone number.
- This is to enable us to contact you regarding your enquiry. Your details may be stored in our CRM system to allow us to record details of your enquiry and the outcomes of this to better meet our customer needs.

2.2. Make an email enquiry

Purpose and legal basis for processing

- When you contact us to make an enquiry, we collect information, including your personal data, so that we can respond to it and fulfil and meet your requirements
- The legal basis we rely on to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides these legitimate interests.

2.3. Applying for a job

- Purpose and legal basis for processing
- What will we do with the information you give us
- What information do we ask for, and why?
- Application stage
- Shortlisting



MORE LIGHT

- Assessments
- Conditional offer
- After you start
- How long is the information kept?
- How we make decisions about recruitment
- Your rights
- Do we use and date processors?

Purpose for legal basis for processing

Our legal basis for processing this information is to assess your suitability for which you have applied. The legal basis we rely on for processing your data is article 6(1)(b) of the GDPR, which relates to the processing necessary to perform a contract or to take steps at your request, before entering into a contract. The legal basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnic information is article 9(2)(b) of the GDPR, which also relates to our obligations in employment, and the safeguarding of your fundamental rights and article 9(2)(h) for assessing your work capacity as an employee. And schedule 1 part 1 (1) and (2)(a) and (b) of the DPA 2018 which relates to processing for employment, the assessment of your working capacity and preventative or occupational medicine.

What will we do with the information you give us?

We will 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 party for marketing purposes.

We will use the contact details you give us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role.

What information do we ask for, and why?

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

Application Stage

We ask for your personal details including, name and contact details, We will also ask about previous experience, education, referees as well as answers to questions relevant to the position. Our recruitment/HR team will have access to all this information.

You will also be asked to provide equal opportunities information. This is not mandatory – if you do not provide it, it will not affect your application. We will not make any of the information available to any staff outside of our recruitment team and hiring managers, in a way that can identify you. Any information you provide will be used to produce and monitor equal opportunities statistics.

Assessments

We may ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; attend an interview; or combination of these. Information will be generated by you and by us. E.g. you might complete a written test or we might take interview notes. This information is held by us.



If you are unsuccessful after the assessment for the position, we may ask if you would like your details retained in our talent pool. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We must confirm the identity of our staff and their right to work in the United Kingdom, and seek assurances as to their trustworthiness, integrity and reliability.

You must therefore provide:

- Proof of your identity – you will be asked to attend our office with original documents; we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents; we will take copies.
- A criminal declaration to declare any unspent convictions.
- Your email address, which we will add to our HR system.
- We will contact your referees, using the details you provide in your application, directly to obtain references.
- We will also ask you to complete a questionnaire about your health to establish your fitness to work.
- If we make a final offer, we will also ask you for the following information:
 - Bank details – to process salary payments.
 - Emergency contact details – so we know who to contact in case you have an emergency at work.

After your start

Some roles may require a higher level of security clearance – this will be clear on the advert or job description (or both) If so, you will be asked to submit information via our Warwickshire or West Mercia Police who will carry out the applications.

They will then tell us whether your application is successful or not. If it is not we will not be told the reason but we may need to review your suitability for the role or how you perform your duties.

How long is the information kept for?

For information about how long we hold personal data, see our retention schedule.

How we make decisions about recruitment

Final recruitment decisions are made by the hiring manager and members of our recruitment team/HR or executive board. We take account of all the information gathered during the application process. Any online testing is marked and a result is generated automatically, however, if you wish to challenge the mark you have received, the result can be checked manually.

You can ask about decisions on your applications by speaking to your contact in our recruitment team by email hr@jenoptik.co.uk



Your rights

As an individual, you have certain rights regarding your own personal data. Please see the section on your Data Protection Rights section 1.4.

Do we use any data processors?

Yes we have several processors to provide elements of our recruitment service for us. Purple HR Ltd are our outsourced HR providers. They will provide you with the initial offer letter and contract of employment. They will hold and store information on our behalf and also make this available online via Breathe HR web application.

Dickinsons Accountants LLP provide our payroll service. They will be provided with your name, bank details, address, date of birth, national insurance number and salary.

In addition to this your details will also be provided to our financial broker Origen to allow you to be auto enrolled into the pension scheme and to arrange death in service insurance benefits. Once Origen have arranged your pension scheme with Royal London. Royal London will act as the Data Controller for this information.

Prior to your final offer you will received a medical questionnaire to complete. Failure to do so may impact your job offer with us. If we feel that on the basis of the medical questionnaire that we need to contact your doctor we will discuss this prior to accessing your medical records under the Access to Medical Reports Act 1988.

For some positions, it may be necessary that we carry our independent medical examination. These will be carried out by K2 Associates UK Ltd. They will be the data controller of your records, but they will ask for your consent to pass this information to us under GDPR article 6(1)(1) and for special category data the GDPR article 9(2)(b). If you do not give consent this may have an impact on your application with our company.

If your position requires you to drive for work, you will also be required to carry out a drivers licence check via our third party provider E-Davis. In Addition to this if you drive your own vehicle for work then you will be required to provide the vehicle(s) registrations and insurance documents so that they can check the vehicle has Valid MOT, TAX and insurance that will cover business usage.

For vacancies we also use recruitment agencies who have been carefully selected by us. Information held by the recruiters for the purpose of the application will be held for a period of 12 months from the date of our agreement with them.

2.4. Attending an exhibition or conference

Purpose and legal basis for processing

Our purpose for collecting this information is so we can facilitate the event and provide you with an acceptable service.



The legal basis we rely on for processing your personal data is your consent under article 6(1)(a) of the GDPR. When we collect any information about dietary requirements we also need your consent (under article 9(2)(a)) as this type of information is classed as special category data.

What we need

When attending an exhibition we may wish to scan your visitor's badge, which we will only do with your verbal consent. We may also collect your information via business cards and ask you to fill in contact details forms.

What we do with it

We use this information to contact you after the event to share product information for which we have been displaying.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

We rely on consent to process the personal data you have given us. This means that you have the right to withdraw consent at any time. If you do that, we will update our records to immediately reflect your wishes.

2.5. Making a subject access request

- Purpose and legal basis for processing
- What we need and why we need it
- What we do with it
- How long we keep it
- What are your rights?
- Do we use any data processors?

Purpose and legal basis for Processing

Our purpose for processing your personal data is so we can fulfil your information request to us. The legal basis for this is article 6(1)(c) of the GDPR which relates to processing necessary to comply with a legal obligation to which we are subject.

If any of the information you provide us in relation to information request contains special category data, such as health, religious or ethnic information the legal basis we rely on to process it is article 9(2)(g) of the GDPR, which also relates to our public task and the safeguarding of your fundamental rights, and Schedule 2 part 2(6) of the DPA2018 which relates to statutory and government purposes.

What we need and why we need it

We need information from you to respond to you and to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we are subject to:

- General Data Protection Regulation (2016)
- Data Protection Act (2018)

What we do with it



When we receive a request from you, we will set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We will also store on this case file a copy of the information that falls within the scope of your request.

If you are making a request about personal data, or are acting on behalf of someone making such a request, then we will ask for information to satisfy us of your identity. If it is relevant, we will also ask for information to show you have authority to act on someone else's behalf.

We will use the information supplied to us to process your information request and check on the level of service we provide.

If the request is about information where we are the data processor on behalf of another organisation, we will consult with the organisation to seek their view on disclosure of the material.

How long we keep it

For information about how long we hold personal data, see our retention schedule.

What are your rights?

For more information on your rights, please visit the ICO

Do we use any data processors?

No – we do not use any data processors for any of the above activities.