



Recruitment Privacy Notice

This Recruitment Privacy Notice ("Privacy Notice") is compliant with relevant Data Protection Law (this will depend on the location of the vacancy) and explains everything you need to know about the personal data we collect during the application and recruitment process. If you are acting on or on behalf of another person, you must make sure that you tell them what you are providing us and have their consent to do so.

We may update this Privacy Notice from time to time. It is important that you check our website for updates.

For the purposes of this Privacy Policy, "we", "us" and "our" means Gibtelecom Ltd and other companies in the same group.

1. How to contact us

Gibtelecom Ltd
15/21 John Mackintosh Square
Gibraltar
+350 20052200

For any queries, please contact our Human Resources (HR) Department at HR@gibtele.com or our Data Protection Officer (DPO) at rachel.harris@gibtele.com.

2. What personal information do we collect?

Personal information which we collect about you may include:

- Contact information
- Copies of driving license, passport, birth certificate and proof of current address (bank statements etc)
- Academic certificates, references, CV's and information contained within application forms;
- Records of correspondence with applicants;
- Personal information relating to pre-employment checks
- Health data, where this is required for us to be able to implement special measures for individuals with a disability

3. How we collect personal information

We collect personal information directly from you whether this is online, via email, at a recruitment fair or otherwise. However, there are occasions where we may learn about you through third parties such as recruitment agencies.

4. Why we collect personal information

We collect your personal information for the following specified purposes:

- To consider your application for a job;
- To contact you about your job application;
- To move your application forward;
- To send you notifications about your progress and/or other similar vacancies or vacancies which are relevant to you.

5. Our lawful basis

Whilst processing your data we will rely on the following lawful basis';

- Contract or legal obligation
- Legitimate interest
- Consent

6. Who we share your information with

Gibtelecom only shares personal data to the extent necessary to run our business to fulfil any contracts and where required by law or to enforce our legal rights. This might mean sharing that information with our partner companies or agencies and their sub-contractors or prospective partners who help us run our services. We might also share your information with any public authority or law enforcement agency (if they ask for it or for vetting purposes for example). We may also share your personal information with a recruitment agency if one has been used through the recruitment process.

7. Where personal information is stored

Personal Information may be held at our offices. It may also be held at the offices of third-party agencies, cloud providers, service providers, representatives, and agents. Where personal information is stored or transferred outside of the European Economic Area (EEA) or Gibraltar, we will ensure that appropriate measures are in place to ensure its adequate protection.

8. How your personal information is kept secure

We adhere to industry best practice technical security measures to protect personal data and ensure no unauthorised or unlawful disclosure; accidental or unlawful damage or loss takes place. Only certain authorised employees at Gibtelecom have access to personal data. Gibtelecom protects its IT systems with firewalls and anti-virus and anti-malware software and other information security technology solutions.

9. How long we keep your personal information

How long we keep your information will depend on whether your application is successful, the nature of the information concerned and the purposes for which it is collected.

If you are unsuccessful, we will keep your personal information for 12 months from the date on which we were last in contact with you. This is to ensure that, where possible, we can re-engage with you should alternative suitable roles arise and to assist us to resolve any issues or queries about the recruitment process which may transpire.

10. Your rights

You have a number of legal rights in relation to the data that we hold about you, including the right to:

- access the data we have about you.
- ask that we update your data if it is inaccurate or incomplete.
- ask that we delete or erase your information. Please note that there may be circumstances where you ask us to delete or erase your information, but we are legally entitled to retain it.
- Object to the processing or request that we restrict the processing of your information. Again, there may be circumstances where we are legally entitled to refuse this request.
- receive and transmit that data in a portable format. Note this right only applies to information which you have provided to us.
- withdraw your consent to the use of your information where we are relying on that consent. Please note that we may still be entitled to process your information if we have another legitimate reason (other than consent) for doing so.
- make a complaint with the Gibraltar Regulatory Authority (www.gra.gi) if you think that any of your rights have been infringed by us.