

# SAIC Motor UK Technical Centre Limited

## Website Privacy Policy

### Introduction

Welcome to SAIC Motor UK Technical Centre Limited's (collectively referred to as "we", "us" or "our") Privacy Policy.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit [www.saicmotor.co.uk](http://www.saicmotor.co.uk) or [www.saicology.co.uk](http://www.saicology.co.uk) (our "Website") (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how we collect and process your personal data through your use of our Website, including any data you may provide through our Website when you make an enquiry or apply about a job vacancy or for work experience.

The Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

### Controller

We are the controller and responsible for your personal data.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### Contact details

Our full details are:

**Full name of legal entity:** SAIC Motor UK Technical Centre Limited

**Name or title of DPO** Layla Sagar

**Email address:** [hrdept@saicmotor.co.uk](mailto:hrdept@saicmotor.co.uk) **Postal address:** Lowhill Lane, Longbridge B31 2BQ

**Telephone number:** 0121 251 3700

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however,

appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance using the details above.

### **Changes to the Privacy Policy and your duty to inform us of changes**

This version was last updated on 02/10/2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice or privacy policy of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, title, date of birth and gender.
- **Contact Data** includes email address and telephone numbers.
- **Recruitment Data** includes your CV, details of your qualifications, skills, experience, employment history, information about your entitlement to work in the UK, references, certificates and licences.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.
- **Usage Data** includes information about how you use our Website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

The only **Special Categories of Personal Data** which we may collect about you via the Website will be that which is evident from any videos you upload in order to take part in any competitions we run via the Website. “**Special Categories of Personal Data**” includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data but, depending on what you choose to include in any video you upload, it is likely that we would only ever collect visible details about your race, ethnicity or health. We do not collect any information about criminal convictions and offences. When submitting a video to us via the Website as part of a competition, please click the relevant box to confirm that you are agreeing to share any Special Categories of Personal Data contained within the video with us. Any Special Categories of Personal Data which you do submit to us in any video will not in any way affect how we judge your competition entry.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods and/or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Recruitment Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - make an enquiry about our products and services via our Website;
  - apply for a job vacancy or for work experience;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google based outside the EU:
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are considering entering into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the details provided above.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
Making a decision about your recruitment or appointment.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Recruitment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to carry out background checks and security vetting in recruitment and HR functions and to ensure we recruit staff who can meet the needs of our business)</li> </ul>
Determining the terms on which you work for us	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Recruitment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to ensure we offer competitive terms to staff)</li> </ul>
Contacting you about other vacancies that you may be suitable for besides the role that you have applied for in our business	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Recruitment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to fill any vacancies in our existing workforce)</li> </ul>
Checking you are legally entitled to work in the UK	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Recruitment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to carry out background checks and security vetting in recruitment and</li> </ul>

		HR functions)
Assessing qualifications for a particular job or task	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Recruitment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to understand the necessary skills required in order to fulfil roles throughout the business and thereby make the right decisions with regards to recruitment and/or promotion)</li> </ul>
Dealing with legal disputes involving you	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Recruitment Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to issue, process, investigate or defend claims involving our business)</li> </ul>
To manage our relationship with you which will include: (a) Notifying you about changes to our Privacy Policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our goods and/or services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our goods and/or services, to develop them and grow our business)
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how clients use our goods and/or services, to develop them, to grow our business and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our Website, goods and/or services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our goods and/or services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods and/or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our goods and/or services and grow our business)

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which goods, services and offers may be relevant for you (we call this marketing).

Where you deal with us as a corporate entity (i.e. as part of or in relation to your business) you will receive marketing communications from us unless you have opted out of receiving marketing.

In all other cases (including where you deal with us in your personal capacity) you will receive marketing communications from us if:

- you have purchased goods and/or services from us; or
- if you have provided us with your express opt-in consent to do so;

and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party company for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, service experience or other transactions.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

We share your personal data within the SAIC Group. This will involve transferring your data outside the European Economic Area (**EEA**).

Due to the nature of our business and the goods and/or services we provide to you, some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by either:

- transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; and/or
- using specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## 8. DATA RETENTION

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where you have applied to us in relation to a job vacancy and have been unsuccessful and you are not contesting our decision, we will hold your Identity Data, Contact Data Recruitment Data for six months after the end of the relevant recruitment process. At the end of that period, we will securely destroy or delete your Identity Data, Contact Data and Recruitment Data.

Where you have applied to us in relation to a job vacancy and your application is successful, your Identity Data, Contact Data, Recruitment Data and any other personal data gathered during the recruitment process will be transferred to your personnel file and retained in accordance with our Privacy Policy for Employees.

Where you have made an enquiry or contacted us through the Website in relation to a particular matter, we will retain whatever personal data you submit to us for as long as it takes us to respond to and resolve and/or deal with your enquiry or particular matter. Once your enquiry or matter has been resolved and/or your dealt with we will securely destroy or delete your personal data.

By law we have to keep some basic information about you for six years in order to bring or defend ourselves against any legal claims.

For all other types of personal data we collect about you via the Website which are not covered in the paragraphs above, we will retain this for three months following the date of collection, At the end of that period, we will securely destroy or delete such personal data.

In some circumstances you can ask us to delete your data: see the "Request Erasure" section of Your Legal Rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain goods and/or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at [hrdept@saicmotor.co.uk](mailto:hrdept@saicmotor.co.uk).

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

- **LAWFUL BASIS**

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

- **THIRD PARTIES**

- **External Third Parties**
  - Service providers who provide IT and system administration services, such as Oracle who provide the Taleo system where we store (amongst other things) all applications for job vacancies.
  - HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.