OG ISMS	
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1. INTRODUCTION

1.1 WHO WE ARE

1 Occam Group Ltd (company number 11986732, whose registered office is at One New St, Wells, Somerset, BA5 2LA) ("we", "us", "our") collects, uses and is responsible for certain personal information about you when you apply for an opportunity with us, when we identify you as a prospective candidate, and during and after your employment or engagement with us. When we do so, we are subject to the Data Protection Act 2018, and the UK General Data Protection Regulation ("Data Protection Law").

2 For the purposes of Data Protection Law, we are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. Occam Group Ltd is registered with the UK Information Commissioner's Office under registration number ZA699702.

1.2 PURPOSE

3 This privacy policy describes how we gather, use and protect personal information about you when you apply for an opportunity with us, when we identify you as a prospective candidate through professional candidate-sourcing activities, and/or when you are employed by us. A prospective candidate is someone we identify as potentially suitable for an opportunity who has not submitted an application.

4 Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that we collect, receive or otherwise process about you.

1.3 TERMINOLOGY USED IN THIS POLICY

5 When we refer to "personal information" in this Policy, we mean any information about an individual which can be used to identify that individual.

6 When we refer to "special category" personal information in this Policy, we mean types of personal information which require a higher level of protection.

2. POLICY CONTROLS

2.1 WHAT PERSONAL INFORMATION WE GATHER

7 Depending on whether you are a prospective candidate, applicant, employee or former employee, we may process the following personal information where relevant:

- Personal contact details (name, title, telephone numbers, address, personal email addresses).
- Date of birth.
- Gender.
- Bank account details.
- Security clearance status.
- Nationality.
- Employment and education history.
- Salary, benefits and pension information.

- Performance, development and training records.
- Emergency contact and next-of-kin information.
- References.
- Copies of right to work documentation.

8 For recruitment, we also process information about your qualifications, skills and experience, publicly available professional information, recruitment correspondence, interview notes and assessments, and records of your progress through the recruitment process. Information obtained through candidate sourcing is limited to information relevant to a genuine vacancy; public availability does not mean that all information about you is relevant to recruitment.

9 We may also collect, store and use the following special category personal information:

- Whether or not you have a disability for which we need to make reasonable adjustments throughout the recruitment process and/or during employment, and if so, the nature of that disability to the extent required to make such reasonable adjustments.
- Sickness, absence, fitness-for-work and occupational-health information.
- Criminal conviction and offence information is not special category data but is subject to separate statutory protections. Our processing of this information is described in section 2.6.

2.2 HOW INFORMATION IS GATHERED

10 We may obtain personal information:

- Directly from you.
- From recruitment agencies.
- During applications, interviews, assessments and other recruitment activities.
- From former employers, referees or other individuals you nominate.
- From publicly available professional sources where we identify prospective candidates.
- Through our recruitment platform and candidate-sourcing system.
- From line managers, HR, other employees and authorised decision-makers during your employment.
- From referees.

11 Where we identify you as a prospective candidate, we may obtain job-relevant professional information indirectly through publicly available professional sources. Public availability alone does not mean that information is relevant or appropriate for us to use.

12 We may also obtain job-relevant information indirectly from publicly available professional sources through candidate-sourcing functionality in Workable, our recruitment platform. We may combine this information with recruitment information we already hold about you to identify potential candidates for genuine vacancies. When we contact you, we explain where we obtained your information and whether the source was publicly accessible.

2.3 HOW WE USE YOUR PERSONAL INFORMATION

13 For prospective candidates who have not applied, we rely on our legitimate interests in identifying and contacting people with relevant professional experience and skills for genuine vacancies, where those interests are not overridden by your interests, rights or freedoms. You may object to this processing by contacting info@occam-group.co.uk. This is separate from processing necessary to take steps at your request before entering into an employment contract.

14 At your request (i.e. through submission of an application) we will process personal information prior to entering into, or in order to enter into, any employment contract.

15 When we obtain your personal information from another source, we provide this privacy policy within a reasonable period and no later than one month after obtaining it. If we communicate with you or disclose your information to another recipient sooner, we provide the privacy information no later than that first communication or disclosure. This includes explaining the categories of information obtained and its source, including whether it came from publicly accessible sources, unless a lawful exception applies.

16 Situations in which we may process your personal information include:

- Identifying and contacting prospective candidates for genuine vacancies.
- Assessing applications and suitability for employment or engagement.
- Arranging and conducting interviews and assessments.
- Checking qualifications, experience and references.
- Checking your right to work.
- Establishing or maintaining any security clearance required for your role.
- Conducting lawful pre-employment checks.
- Reimbursing agreed recruitment expenses.
- Entering into and administering your employment contract.
- Administering salary, expenses, pensions and benefits.
- Managing working arrangements, attendance and absence.
- Managing performance, objectives, training and professional development.
- Managing sickness absence, occupational-health referrals and reasonable adjustments.
- Managing capability, disciplinary and grievance matters.
- Protecting health, safety, security and business continuity.
- Complying with our legal and regulatory obligations.

17 We may use technology-assisted functionality to support candidate sourcing, matching and recruitment administration. We do not make recruitment or employment decisions solely through automated processing. An authorised person reviews the relevant information and makes the recruitment or employment decision.

18 If you fail to provide certain information when requested, we may not be able to process your job application either in whole or at all, or we may be prevented from complying with our legal obligations, and you may be unable to exercise your statutory rights.

2.4 CHANGE OF PURPOSE

19 If you are unsuccessful in your application, we may wish to continue to hold your personal information in case of future opportunities for which we believe you would be suitable. We will ask for your consent to keep your personal information for this purpose and you will be able to withdraw such consent at any time.

2.5 HOW WE USE SPECIAL CATEGORY PERSONAL INFORMATION

20 We process special category personal information where it is necessary to carry out obligations or exercise rights in connection with employment, equality, social security or social protection law. We may also process such information where necessary to establish, exercise or defend legal claims, or where another condition permitted by Data Protection Law applies.

21 Situations in which we may process your special category personal information are listed below:

- To ensure we comply with your statutory rights.
- Arranging and implementing reasonable adjustments during recruitment or employment.
- Obtaining and considering occupational-health advice.
- To assess your suitability for employment.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate adjustments to allow you attend interview.

22 Where we obtain occupational-health advice, we normally seek information relevant to fitness for work, functional limitations, workplace restrictions, reasonable adjustments, likely duration and review arrangements. We do not routinely require detailed medical histories, diagnoses or treatment information unless this is necessary for a particular lawful employment purpose.

23 We may use your special categories of personal information, and any information about any criminal convictions and offences, where it is needed to establish, exercise or defend legal claims.

2.6 INFORMATION ABOUT CRIMINAL CONVICTIONS

24 Due to the nature of some of our work, including work within the defence and national-security sectors, we require all staff to undergo pre-employment screening meeting the Cabinet Office's "Baseline Personnel Security Standard". This includes carry out criminal record checks using the Disclosure and Barring Service ("DBS") (or "Disclosure Scotland" in Scotland).

25 An appropriate lawful basis under Article 6 UK GDPR and an applicable condition under the Data Protection Act 2018 has been established for processing this data.

26 Criminal conviction and vetting information is only retained for as long as necessary for the relevant recruitment, security or legal purpose and in accordance with our retention requirements. Where it is sufficient to retain the outcome or status of a check rather than the underlying information, we will do so.

2.7 WHO WE SHARE YOUR PERSONAL INFORMATION WITH

27 We may share your personal information internally within the company in order to progress your job application and make a decision about recruitment, and/or conduct administration activities in relation to your employment.

28 We will only disclose your personal information to third parties when the law allows us to do so. These may include, but are not limited to:

- External organisations for the purposes of conducting pre-employment reference and employment background checks.
- Our recruitment platform and provider.
- Payroll and Pension service providers.
- External organisations for the purposes of obtaining security clearance.
- Former employers or other referees in order to collect references.
- Professional advisors.
- Banking, pension, private health and insurance providers.
- Regulators to ensure compliance with the law.

29 Other third parties where it is necessary in order to enter into a contract with you, fulfil obligations of such a contract, in order to comply with a legal obligation, or where it is necessary for our interests (or those of a third party).

2.8 PROTECTING YOUR INFORMATION

30 Any personal information we hold about you is stored and processed in accordance with the UK General Data Protection Regulation (GDPR). As such we have put in place appropriate security measures to prevent your personal information from being used or accessed unlawfully or accidentally lost. Access to personal information is limited to people who need it for an authorised business purpose.

31 If we become aware of a personal data breach, we will promptly take all necessary steps to address such breach and we will respond to it in accordance with Data Protection Law. Where required, we will notify the Information Commissioner and affected individuals within the applicable legal requirements.

32 In the event that we become aware of an actual or suspected data security breach, we will promptly take all necessary steps to address such breach and notify you accordingly if your personal information has been affected.

2.9 HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

33 We will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

34 If your application or engagement is unsuccessful, we will normally retain your recruitment record for six months after the recruitment process has concluded or our last meaningful contact with you, whichever is later. We may retain particular information for longer where this is necessary to establish, exercise or defend legal claims or meet another legal obligation.

35 Where we identify you as a prospective candidate and you do not apply for a role, we will normally retain your recruitment information for no longer than six months after our last

meaningful recruitment contact or consideration, unless we have another lawful reason to retain it.

36 If you have consented to us keeping your personal information on file, in case there are future suitable employment opportunities with us, we will hold your personal information for a period of time as agreed with you, or until you withdraw your consent if earlier.

37 If your application is successful, relevant recruitment information will become part of your employment record. Employment records are retained during your employment and for the applicable period after employment ends in accordance with our Data Retention Policy and legal, regulatory and legitimate business requirements. Different categories of records may have different retention periods.

38 Personal information which is no longer retained will be securely and effectively destroyed or permanently erased from our IT systems.

2.10 YOUR RIGHTS & RESPONSIBILITIES

39 It is important that the personal information we hold about you is accurate and current. Please keep us informed where information you have provided to us changes during your application, recruitment process or working relationship with us.

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

- Request access to your personal information (commonly known as 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 correction 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 and there is something about your particular situation which makes you want to object to processing on this ground.
- 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.

41 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact us using the following email address: info@occam-group.co.uk.

42 For more information about your rights, you may wish to look at the Information Commissioners Office website www.ico.org.uk. In the event you have a complaint relating to our handling of your personal information, you also have the right to lodge a complaint with us or the Information Commissioner. Please send complaints using the following email address: info@occam-group.co.uk.

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

44 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

2.11 RIGHT TO WITHDRAW CONSENT

45 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we receive notification that you have withdrawn consent, we will stop processing your information for that consent-based purpose unless another lawful basis permits or requires us to continue processing particular information.

3. HOW TO CONTACT US

46 If you have any questions about this policy or how we handle your personal information, please contact us using the following email address: info@occam-group.co.uk.

4. CHANGES TO THIS POLICY

47 We may update this Policy from time to time to reflect changes in our processing activities, systems, suppliers or legal obligations. The current version will be made available to applicants, prospective candidates and employees as appropriate. Where a change materially affects how we use personal information, we will take reasonable steps to bring the change to the attention of affected individuals.