

SKYBOUND INNOVATIONS LTD

CANDIDATE PRIVACY NOTICE

WHAT IS THE PURPOSE OF THIS DOCUMENT?

SkyBound Innovations Ltd, a company incorporated and registered in England and Wales with company number 10350286 whose registered office is at 13 Weatherbury Way, DT1 2ED ("**SkyBound**", "**we**", "**us**", "**our**") is committed to protecting the privacy and security of your personal information.

SkyBound is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice applies to you because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used by us, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided to you under the UK General Data Protection Regulation ("**UK GDPR**").

We use Charlie Recruit, an online application provider and applicant tracking system ("**ATS**"), for assisting with our recruitment processes. Charlie Recruit processes personal information about you; you can find their privacy notice by visiting <https://www.charliehr.com/privacy>.

Where you apply for a job opening posted by us, whether via Charlie Recruit or by other means, this privacy notice will apply to our processing of your personal information together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you.

Changes to the Privacy Notice and Your Duty to Inform Us of Changes

We keep our privacy notice under regular review. This version was last updated in August 2025.

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.

DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

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).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health, sexual orientation or criminal convictions.

In connection with your application for work with us, we may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, last name, username or similar identifier, marital status, title or position, date of birth, and gender.
- **Contact Data:** includes address, private and business email addresses, and telephone numbers.
- **Correspondence:** If you contact us by email we may keep a copy of the correspondence.
- **Eligibility Data:** includes information about your experience and qualifications, right to work information, citizenship, and criminal background checks.

We may need to collect, store and use the following types of more sensitive personal information:

- information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions;
- information about your health, including any medical condition, health and sickness records; and/or
- information about criminal convictions and offences.

HOW YOUR PERSONAL DATA IS COLLECTED

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

- **Direct Interactions.** You, the candidate, may give us your Identity and Contact Data by filling in forms and fields on our application form, and you may give us your Professional and Eligibility Data in the form of a CV, reference, resume or covering letter. This includes personal data you provide when you apply for a role and provide us with feedback or contact us.
- **Third parties or Publicly Available Sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Professional Data from professional profiles available in the public domain (for example, LinkedIn, Twitter, or corporate websites); and
 - Identity and Contact Data from publicly available sources.

HOW WE WILL USE YOUR PERSONAL DATA

We will only use your personal data where the law permits us to do so. Most commonly, we will use the personal data we collect about you in the following circumstances:

- To assess your skills, qualifications, and suitability for the work.
- To carry out background and reference checks, where applicable.
- To communicate with you about the recruitment process.
- To keep records related to our hiring process.
- To comply with legal or regulatory requirements, including where necessary to make or defend any legal claims relating to our recruitment process and where necessary to comply with any court orders or enquiries from regulators.
- To help our service providers and partners (such as the job sites through which you may have applied) improve their services.

It is in our legitimate interests to decide whether to appoint you to the relevant role or work since it would be beneficial to our business to appoint someone to that role or work.

We also need to process your personal information to decide whether to enter into a contract with you.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

Where appropriate, we may use your particularly sensitive personal information in the following ways:

- We may use information about a disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We may use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process.

We may collect information about your criminal convictions history if we would like to offer you the work or role. We will inform you if your offer is conditional on background checks and any other conditions (such as references) being satisfactory.

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 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.

AUTOMATED DECISION MAKING

We will not make recruitment decisions that will have a significant impact on you based solely on automated decision-making processes.

DATA SHARING

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application:

- Charlie Recruit, as your personal information will be held on their ATS platform;
- Reed Specialist Recruitment Limited, who support us with any necessary background checks;
- our professional advisers, such as our lawyers or accountants (where necessary for the purposes outlined above);
- any government, regulatory or law enforcement agency (where necessary for the purposes outlined above); and
- with our affiliates or in the context of a sale or transaction involving the whole or part of our business.

All third parties are required to take appropriate security measures to protect your personal information.

Transferring information outside the UK

As part of the recruitment process, we may transfer the personal information we collect about you outside the UK on an ad hoc basis, for example where this is necessary for interaction with you, and you are located outside of the UK. This will only take place where you consent to this, or where this is necessary for us to enter into an employment contract with you.

Where we transfer your personal data to countries that are not deemed to provide an adequate level of protection for personal data, we will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection. Further information about these protective measures is available from the contact point referred to below.

Your personal information may also be hosted on the Charlie Recruit ATS platform, who may either host that system on servers outside of the UK, or they may allow their employees or contractors to access systems from outside of the UK (for example, to provide us with support outside of UK working hours). More information about where Charlie Recruit may store or process your personal information is set out in their privacy notice, available at: <https://www.charliehr.com/privacy>.

DATA SECURITY

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

We have also 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

DATA RETENTION

For How Long Will We Use Your Personal Data?

We understand our legal duty to retain accurate data and only retain your personal data for as long as we require it for our legitimate business interests and that you are happy for us to do so.

We will retain your personal information for a period of twelve (12) months after we have communicated to you our decision about whether to appoint you to the role or work. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we would like to retain your personal information on file for a longer period, on the basis that we might be able to consider you for an opportunity that may arise in future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period for that purpose.

DATA SUBJECT RIGHTS

In certain circumstances, you have rights under data protection laws in relation to your personal data which include the right to:

- **request access** to your personal data and to certain other supplementary information that this privacy notice is already designed to address (commonly known as making 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 rectification** 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 personal data concerning you in certain situations. 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 (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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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.

If you wish to exercise any of the rights set out above, please contact us on the details listed below.

QUESTIONS OR COMPLAINTS

If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact HR@skyboundrescuer.com

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO) – the UK regulator for data protection issues (www.ico.org.uk). However, we would appreciate the chance to address your concerns before you approach the ICO, so please do contact us at the first instance of an issue.