

COSTAIN RECRUITMENT
PRIVACY AND COOKIES POLICY

1. INTRODUCTION

- 1.1 Costain Group PLC and its subsidiary companies (the “Company”) are committed to respecting your privacy.
- 1.2 This privacy policy (the “Policy”) explains how we collect, store, use and otherwise process personal data relating to recruitment on the Costain Recruitment Portal or which is otherwise collected by the Company during the process of recruitment.
- 1.3 This Policy may change from time to time and, if it does, the up-to-date version will always be available on the Costain Recruitment Portal and becomes effective immediately.
- 1.4 The data controller is the Company.
- 1.5 In this Policy, Data Protection Law means the General Data Protection Regulations [\(EU\) 2016/679](#) which is now incorporated into UK law and is now known as UK GDPR; the [Data Protection Act 2018](#); any laws which implement any such laws; and any laws that replace, extend, re-enact, consolidate or amend any of the foregoing.

2. SCOPE

- 2.1 This Policy applies to personal data relating to recruitment that the Company holds on the Costain Recruitment Portal or which is otherwise collected by the Company during the process of recruitment.
- 2.2 The scope of this Policy also applies to where personal data is provided to the Company on behalf on an individual, such as through a job boarding company (for example, Indeed, Monster Job or LinkedIn), by a recruitment agency or other organisation acting on behalf of an individual.
- 2.3 Where you provide personal data about other people (for example, if you are a recruitment agent), you represent and warrant that you have the consent of the individual to do this and that the information is accurate and up-to-date. You will inform us if the wishes of the individual or any information changes.
- 2.4 The Company uses such personal data for the purposes of recruiting for roles including permanent or temporary roles, as well as consultancy, agency, casual and contract work. In situations where the Company is recruiting a role on behalf of a client, of which you will be advised during the recruitment process, your personal data will be shared with the client who will also be a data controller of your data.
- 2.5 Pages of the Costain Recruitment Portal may, from time to time, contain links to and from the websites of advertisers and partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that the Company does not accept any responsibility or liability for these policies or use of the website. Please check these policies before you submit any personal data to these websites.

3. COLLECTION AND USE OF PERSONAL DATA

- 3.1 Your personal data will only be processed for the purposes set out below and in accordance with Data Protection Law. The Company will not process your personal data in any manner incompatible with those purposes unless we are required by law to do so.
- 3.2 The Company may hold and process your personal data for the following purposes:
 - (a) recruitment and on-boarding (personal contact details such as name, title, addresses, telephone numbers and personal email addresses, dates of birth, gender, national insurance

number and bank account details, data relating to right to work checks, references, curriculum vitae, work history and other information included in as part of the application process);

- (b) for administration of remuneration payments including outstanding student loans, court orders and statutory payments;
- (c) pre-employment screening such as reference checks, right to work checks and criminal conviction checks;
- (d) equal opportunities monitoring (including information about your gender, race, ethnicity, sexual orientation and disabilities);
- (e) recording your attendance at our premises for the physical security of our business and administration purposes;
- (f) parking purposes whilst visiting our premises, your vehicle registration number is recorded;
- (f) health and safety compliance, to assess your working capacity and occupational health;
- (g) security and crime prevention including CCTV and photographic images;
- (h) to comply with any legal obligations which apply to us or policies that we have in place;
- (i) as we feel is necessary to prevent illegal activity or to protect the Company's interests or the interests of a third party such as our clients; and
- (j) as we feel is necessary to provide our services or operate our business.

3.3 The information above will not be mandatory in some instances and you will be advised of this during the recruitment process.

3.4 Special categories of personal data (such as information about your health) will be processed where the Company needs to carry out its legal obligations; to run the business; where the processing is necessary for the assessment of your working capacity, occupational health or obtaining a medical diagnosis; or where it is needed in the public interest (such as equal opportunities monitoring).

3.5 The Company makes every effort to ensure that your personal data is accurate and, where necessary, kept up to date. It is your responsibility to ensure that your information you provide and is kept on the Costain Recruitment Portal is accurate and kept up to date. You should access the Costain Recruitment Portal regularly to ensure that your details including your curriculum vitae is up to date. In the absence of evidence to the contrary, the Company shall assume that the information provided by you is accurate.

3.6 We rely on one or more of the following legal basis for processing your personal data:

- (a) for the performance of, or entry into, a contract with you or a third party (for example, where you are a recruitment agent);
- (b) to comply with our legal and regulatory obligations;
- (c) we (or a third party such as our client) has a legitimate interest in doing so and where these legitimate interests are not overridden by your (or the relevant individual's) interests. These legitimate interests will include our interests in managing our relationship with our clients, administering visits to our offices and projects and ascertaining achievement of proper standards/ compliance with policies, practices or procedures;

- (d) where processing of special category data is necessary in the context of the establishment, exercise or defence of legal claims or in the substantial public interest; and
- (e) where we have obtained your express consent to do so. As we will explain at the time we collect your consent, you may withdraw your consent at any time in accordance with the information we provide to you at that time. This is explained at paragraph 6 of this policy.

4. SHARING YOUR DATA AND SECURITY

- 4.1 For the purposes set out above, the Company may transfer personal data to third parties. These include our clients; joint venture partners; sub-contractors or suppliers including our Costain Recruitment Portal provider; our professional advisors, insurers and regulatory bodies. This will be for one of the following reasons: you specifically request that we do this; it is necessary to provide information or services to you; for our legitimate interests or the legitimate interests of a third party (such as our client); in the public interest; or to carry out our legal or regulatory obligations.
- 4.2 Personal data may be shared between the parties listed in paragraph 4.1 above and/or the relevant entities within the Company's group. Where personal data is shared with other parties and/or outside the European Economic Area, the Company will ensure continued compliance with Data Protection Law.
- 4.3 We will not rent or sell your personal data to any other organisation or individual.
- 4.4 The Company has put in place measures to ensure the security of the information collected and its correct use. These are appropriate to the nature of the information and to prevent unauthorised access. All incoming emails are scanned using virus-checking software. The software will also block unsolicited marketing email (spam) and emails which have potentially inappropriate attachments. All personal data you register on the Costain Recruitment Portal will be located behind a firewall. Once we have received your information, we follow strict security procedures as to how your personal data is stored and who sees it, to help stop any unauthorised person getting hold of it. Access to your personal data will only be given to those who strictly need such access.

5. RETENTION

- 5.1 Where you are successfully placed with the Company, your personal data will be retained in accordance with the Staff Privacy Policy which can be accessed via the Company's intranet.
- 5.2 If you are unsuccessful in the opportunity applied for your personal data will be anonymised twelve months after your most recent application, Notwithstanding the foregoing, you have the right to request we delete your personal data in accordance with paragraph 10.
- 5.3 Subject to paragraphs 5.1, we will keep your personal data stored on our systems for only as long as is necessary to achieve the objectives at paragraph 3 of this Policy, albeit we may keep your data for longer than this if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for statistical purposes.
- 5.4 The third parties we engage to provide services on our behalf will keep your personal data stored on their systems for as long as is necessary to provide the services to you; for such purposes that the personal data was disclosed for; and for legal and regulatory reasons.

6. WITHDRAWING CONSENT

- 6.1 Where you have provided consent for us to process your personal data, you may withdraw your consent to this processing. Where you have submitted information via the Costain Recruitment Portal, you can withdraw your consent through the Costain Recruitment Portal. In all other circumstances that you have submitted your personal data, you can withdraw your consent by contacting us.

6.2 If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds and will notify you of these at such time.

7. **DATA PORTABILITY**

7.1 Where you have provided personal data to the Company, which is processed on the basis of consent and by automated means, you can ask to receive that personal data in a structured, commonly used and machine-readable format.

8. **ACCESS YOUR PERSONAL DATA**

8.1 You can access and retrieve the information held about you on the Costain Recruitment Portal directly.

8.2 You can also write to the company to request confirmation of whether we hold personal data about you, the details of the personal data and access to that personal data from us. Your request will be processed and the information to which you are entitled will be provided to you no later than one month (except in extenuating circumstances) from when we receive your request, subject to the requirements and exemptions of Data Protection Law. If such extenuating circumstances mean we are unable to comply with your request within one month, we will tell you as soon as possible about this delay.

8.2 Examples of exceptions, where the Company (by law) does not provide access to personal data include:

- (a) References written by the Company;
- (b) Any data from which a third party can be identified;
- (c) Any data held for the purposes of management forecasting or planning;
- (d) Any data prejudicing ongoing negotiations with the employee; and/or
- (e) Any data protected by legal privilege.

9. **REQUEST YOUR DATA IS RECTIFIED**

9.1 You can rectify the information held about you within the Costain Recruitment Portal directly.

9.2 You can also write to the Company where personal data is inaccurate or where you would like us to complete any incomplete information. You should provide us with a statement that sets out the details of your request for rectification.

10. **REQUEST YOUR DATA IS DELETED**

As the Company is obliged to collect data to report on equal opportunities, it cannot fully delete records however you can request that your personal identifiers are anonymised so that you are no longer able to be identified or contacted. You can make a request for anonymisation in one of the following ways:

10.1 You can request the Company to anonymise your personal data in the Costain Recruitment Portal.

10.2 You can also write to the Company to request that your personal data is anonymised where the Company does not have grounds to continue processing your personal data. The Company will be unable to comply with your request in certain circumstances including, for example, if the Company has a legal obligation to continue processing the data.

11. **OBJECT TO PROCESSING**

11.1 You can object to the Company processing your personal data where (i) the Company is processing your personal data on the basis of its legitimate interests or (ii) you have grounds to believe that the

Company no longer needs the personal data for the purposes or (iii) the processing is unlawful or (iv) you have contested the accuracy of the personal data.

11.2 To exercise any of the above rights, you should make your request via email to hr.action@costain.com.

12. SOCIAL PLUG-INS

Social plug-ins from LinkedIn

12.1 We use plug-ins which are provided by LinkedIn Corporation (LinkedIn), 2029 Stierlin Court, Mountain View, CA 94043, USA. These plug-ins can be identified by the LinkedIn logo and the LinkedIn "Share" button. If you access our website using this plug-in, your browser sets up a direct connection to the LinkedIn servers. LinkedIn receives information that you (your IP-address) has accessed our website. If you click on the LinkedIn "Share" button while you are logged in on your LinkedIn account, you can link certain content on your LinkedIn-Profile which enables LinkedIn to allocate the visit to our website

to your LinkedIn account. We do not know the content of the data transferred to LinkedIn or how LinkedIn uses such data.

LinkedIn Insights

12.2 This enables in-depth campaign reporting and unlocks valuable insight about website visitors. The LinkedIn Insight Tag tracks conversions (sign ups), allows for retargeting of ads to website visitors, and unlocks additional insights about members interacting with LinkedIn ads. Details about collecting and handling your personal data by LinkedIn as well as your rights and setting options for protecting your personal information can be found in the LinkedIn privacy policy which can be found at www.linkedin.com. If you do not want to track your behaviour as a LinkedIn member on third-party websites, you can opt out in your LinkedIn settings.

13. CONCERNS

13.1 If you have concerns around the use of your personal data in the context of this Policy, please address your concerns to hr.action@costain.com in the first instance.

13.2 If you are dissatisfied with the response of the Costain HR Department, please address your concerns to the Costain Legal Department at Costain Group PLC, Costain House, Vanwall Business Park, Maidenhead, Berkshire, SL6 4UB. Should you remain dissatisfied following the response of the Costain Legal Department, you can address your concerns to the Information Commissioner's Office.

COOKIES POLICY

1. What are cookies?

There is a technology called "cookies" which can be used to provide you with tailored information when visiting the Company website. A cookie is an element of data the website will send to your browser, which will then be stored on your computer. This element of data is a piece of text, not a program. The website can only access the information from a cookie sent by website and it cannot access other cookies sent by other web sites or the information contained there. Additionally, we cannot learn your email address or any other information about you through the use of a cookie.

2. Why does the website use cookies?

The Company uses cookies to track usage of the website and to customise your experience when you are visiting the website. By tracking usage, we can best determine what features of the website best serve you.

3. What benefits do I receive from cookies?

Overall, the use of cookies helps to give you a customised experience when visiting the website. Through the use of cookies, we will know what's working and what's not. That information is then used to keep our website fresh and relevant to you. Cookies also allow for the personalisation of any online services we may provide to you.

4. May I decline to accept a cookie?

You may decline to accept cookies sent by the website by changing the settings of your browser to reject cookies or you can also use the cookie panel to make your choice.

5. Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. *Last updated on: 24 May 2018*