

Volet Recruitment Data Privacy Statement

What is the purpose of this document?

At Volet we are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during the recruitment process.

Each location in Volet has responsibility for its own hiring processes. This means that the “data controller” for your data is the Volet entity to which you are applying to work. You can find the email address for contacting the Volet entity you are applying to in Appendix 1.

As Volet we are responsible for deciding how we hold and use personal information about you. This document describes the information we collect in relation to those who apply to work for us and how we use it and how your privacy is safeguarded in the course of the recruitment process.

It is intended to comply with our obligations to provide you with information about our processing of your personal information under applicable privacy laws. It does not create any rights beyond the data protection and privacy laws applicable to the location in which you have applied to work.

Our Approach to Data Protection

At Volet we take the privacy and security of data extremely seriously and strive to achieve the standards of data security and governance that represent global best practice.

However we are a complex organisation with 99% of our global workforce employed outside of the UK and over 90% employed outside of the EU. With employees and business activities distributed across 21 countries our approach is one of “demonstrable global adherence to the principles of excellence in our control and processing of personal data”.

Where local laws mandate stricter levels of controls in the handling of your personal data then these requirements will always be our minimum standards in that jurisdiction.

Base Principles

Our global data privacy practices are derived from the General Data Protection Regulation (“GDPR”) on data protection and privacy in the EU and EEA. This EU regulation sets out seven key principles for effective general data protection. Whenever we collect or use personal information, we will ensure that at least one of the lawful justifications for processing personal information (applicable in the jurisdiction to which you have applied) applies to the processing of the information which we intend to carry out.

This will also include one of the lawful bases for processing applicable in jurisdictions aligned with EU data protection laws which includes when the processing is necessary to take steps to enter a contract with you or for the performance of a contract with you; compliance with a legal obligation; to protect your, or someone else’s, vital interests; for a task in the public interest; or for our or a third party’s legitimate interest (where that interest is not overridden by your rights or freedoms).

Often we won’t collect any special category or sensitive personal data during the recruitment process itself, before an offer is made. However, if we do we will ensure that we also have an additional lawful justification for collecting or using it if required.

In EEA jurisdictions, the UK and other jurisdictions aligned with EU data protection laws the lawful bases on which we can process personal information includes where it is necessary to comply with legal obligations connected with employment, social security and social protection; to protect your, or someone else’s, vital interests; to establish, exercise or defend legal claims; or for reasons of substantial public interest under applicable local law.

Your consent will be sought where this is required or where this is permitted and there is no other applicable lawful basis on which to collect or use your information.

The kind of information we will hold about you

Personal data, or personal information, means any information that relates to an identified or identifiable individual (either directly or indirectly). It does not include data where the identity has been removed (anonymous data).

Applying for a role

If you apply online using the Volet Recruitment Management System on our website (www.career.volet.com) then your personal data will be collected and stored on this recruitment system. When using our online system you will be asked to acknowledge that you want us to go ahead and use your information to process your application with us.

We collect, store, and use the following personal information about you prior to making you a job offer:

- Personal contact details such as your name, title, home address, telephone number, and a personal email address.
- Application forms (automated or manual) as required during the hiring process
- Your CV or Resume
- Your location
- Results from web-based psychometric profiling tools (SHL, Sandler Devine) and other skill-based assessments (automated or manual)* conducted during the hiring process
- Answers given during interviews
- Right to work documentation
- Other information which you choose to share with us (such as details of a disability if you are seeking accommodations or adjustments to the recruitment process)

Accepting a job offer with Volet

If you are successful in receiving a job offer from Volet then we will need to ask you for additional personal information in order to confirm your right to work (if not already validated earlier in our recruitment process), to prepare your contractual documentation and to onboard you as an employee.

In this situation each Volet site will collect, store and use many of the following pieces of personal information* depending on your role, the job requirements and the country in which the employment is to be based:

- Your personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information.
- A unique personal identifier such as a National Insurance number (UK)
- Your bank account details, payroll records and tax status information
- Salary, annual leave, pension and other benefit-related information.
- Start date
- Location of employment or workplace
- Copy of your driving licence
- Recruitment information (including copies of your right to work documentation, references and other information included in your CV or cover letter or other materials submitted as part of the application process).
- Information about criminal convictions and offences from any pre-employment screens that are required in some jurisdictions (see table below).

Country	Checks undertaken	Application
UK	CRB/DBS (Disclosure and Barring Service) Check	All Head Office Finance roles
Mexico	Personal declaration procedure via Government office	Required in Mexico for CTPAT related roles
Vietnam	Personal declaration procedure via Police Station	
USA	HR payroll provider provides pre-employment screening service for all hires into Volet Inc., MCE Electronics conducts background checks for senior staff via insurance brokers	

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How is your personal information collected?

We collect personal information about employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or via a background check provider. Our HR specialists and the hiring managers are also channels through which your personal information will be collected.

How we will use information about you?

We will only use your personal information when the law allows us to. We will use your personal information where reasonably required pursuant to your application. We will only use any special categories of personal data where necessary pursuant to your application.

In connection with your recruitment we use your personal information for the following purposes:

- Recruitment and Selection - Considering your suitability to work for us in the role you have applied for, comparing you to the role requirements and making recruitment decisions;
[GDPR Lawful Basis: Legitimate interest]
- Pre-Employment Checks - Appropriate pre-employment screening including, where relevant and appropriate, identity check, right to work verification, reference check, credit check, financial sanction check, criminal record checks (if and to the extent permitted by applicable laws), relevant employment history and relevant professional and educational qualifications through verification of graduate, post-graduate and professional certifications that are relevant and required for the role that you are applying for;
[GDPR Lawful Basis: Legal obligation where checks are mandatory; public interest for criminal record checks; and legitimate interest of Volex for other checks. Consent if required in your jurisdiction]
- Offers and onboarding - Making offers of work, providing employment agreements or engagement terms and preparing to commence your work relationship where you accept an offer from us;
[GDPR Lawful Basis: Entering into a contract and legitimate interest]
- Future job opportunities – To contact you if you are not successful in your initial application should another potentially suitable vacancy arise during a period after completion of the recruitment process for the role you originally applied for where you are happy for us to do this;
[GDPR Lawful Basis: Legitimate interest or, where required, consent]
- Recruitment feedback, complaints and claims - To deal with any query, challenge, claim or request for feedback received in relation to our recruitment decisions;
[GDPR Lawful Basis: Legitimate interest of Volex and defending legal claims]
- Legal compliance - Complying with laws and regulation applicable to Volex (for example health and safety legislation, taxation rules, anti-discrimination laws and other employment laws, and regulation to which Volex is subject in the conduct of its business) and complying with lawful requests for disclosure of information by public authorities or law enforcement agencies.
[GDPR Lawful Basis: Legal Obligation]

If you fail to provide certain information when requested or prevent us using it for a purpose we need to use it for, we may not be able to consider or progress your application.

External data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group. We will not authorise the use of your data unless it's in relation to your employment. We will always require third parties to respect the security of your data and to treat it in accordance with the law and will ensure a written data sharing agreement is in place prior to transfer where required.

Data is shared externally to Volex in the following circumstances:

- Recruitment agencies involved in your recruitment
- Background check providers where applicable
- Payroll processing
- Employment Benefits provision including health and life insurance

- Ensuring compliance with tax and social insurance laws as defined in each country
- Disclosure to our professional advisors such as legal or financial advisors
- Disclosure to national or state authorities as required under local or national laws

Internal data sharing

Your personal information will be shared internally where relevant with members of the HR team, hiring managers and other managers involved in the recruitment and onboarding process. Given the global nature of our business with employees often in different countries to their line managers we may transfer your personal information into, within and from, the EU to other parts of the Volex group. If we do, you can expect a similar degree of protection in respect of your personal information.

The primary data flows are into the UK as our corporate head office is located in the UK, however our Executive Leadership Team are based in the following countries: Australia, China, the United Kingdom and the United States of America.

Data security

We have put in place measures to protect the security of your information. These apply at all Volex locations. Electronic personal data is stored on secure servers with access restricted to authorised data processors. Laptops, where used, are fitted with encryption software and all data is secured with access strictly controlled to only those employees who are authorised to have it.

Data retention

How long will you use my information for?

We will only retain your personal information 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 and dealing with any claims arising for which the information is relevant. For information on our data retention principles please see Appendix 2.

If you are not successful in your application or do not accept a job offer from us we will only retain your information for a period of 6 months (subject to applicable local laws) to enable us to deal with any issues arising out of the recruitment process unless you provide us with specific consent to retain your information longer to enable you to be considered for future vacancies.

Where you accept an offer to work for us then the information you provided for the recruitment process which will be relevant to your employment will be retained and transferred to our HR records and retained in line with our retention periods for HR data [as explained in our employee privacy notice].

Any psychometric profiling data is retained for 6 months post the recruitment process and thereafter only in an anonymised form solely for the purpose of creating normative statistical data to enhance our ongoing recruitment process.

Your rights regarding your personal information

At Volex we will comply with any rights you have in relation to your personal information under applicable laws. Where, and to the extent that they apply in the location you have applied to work in, your rights may include some or all of the following which are the individual rights (as defined by the GDPR) applicable in the EEA and UK:

- Right to request access to your personal information (a subject access request) and to receive a response, normally within 1 month of receipt.
- Right to request correction of any personal information that we hold about you which is inaccurate.
- Right to request erasure of your personal information in certain circumstances such as when we no longer have any need for it or have breached applicable data protection rules.
- Right to object to the processing of personal information for a purpose 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. In that case we may need to stop or restrict our processing for that particular purpose if we do not have compelling legitimate grounds to continue which override your concerns.

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- Right to request the restriction of processing of your personal information in certain circumstances such as where processing is unlawful.
- Right to request the transfer of certain personal information to another party.
- Right to withdraw consent in situations where we rely on your consent to process the personal data.
- The right to raise any concerns with a data protection supervisory authority in your location if you believe processing of your personal information infringes applicable Law. In the UK the supervisory authority is the Information Commissioner's Office (ICO).

Your duty to inform us of changes

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

If you wish to discuss your personal data or exercise any of your rights please contact the local HR officer or our Group HR Director or our data protection officer (contact details provided in Appendix 1).

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This privacy notice was last updated on 04 November 2023.

If you have any questions about this privacy notice, please contact the HR manager at the site/location you are applying to or the Group HR Director.

Contact details are available in Appendix 1.

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Appendix 1 – Contact Details for Data Controllers

Corporate Head Office (UK)

Group HR Director	alan.taylor@volex.com
Group Legal Director	christian.bedford@volex.com

Jurisdictions in the EU/EEA region

Germany	Group HR	joanna.westacott@volex.com
Ireland	Group HR	joanna.westacott@volex.com
Netherlands	Group HR	joanna.westacott@volex.com
Poland	HR Manager	izabela.lubinska@volex.com
Romania	Group HR	joanna.westacott@volex.com
Slovakia	HR and Finance Manager	erika.tormaova@silcoteceurope.com
Turkey	HR Director	okay.yarar@de-ka.com

Jurisdictions in the Asia Pacific region

Australia	Regional HR Director	corwin.wong@volex.com
China		
o Henggang	HR Manager	tracy.chen@volex.com
o Suzhou	HR Manager	angel.chen@volex.com
o Zhongshan	HR Manager	linsa.lam@volex.com
Hong Kong	Regional HR Director	amy.zhang@volex.com
India	HR Director	shrikant.talawar@inyantra.com
Japan	Regional HR Director	corwin.wong@volex.com
Indonesia	Regional HR Director	rima.melati@volex.com
Malaysia	Regional HR Director	corwin.wong@volex.com
Philippines	Regional HR Director	corwin.wong@volex.com
Singapore	Regional HR Director	corwin.wong@volex.com
Taiwan	Regional HR Director	amy.zhang@volex.com
Thailand	Regional HR Director	corwin.wong@volex.com
Vietnam	HR Manager	huong.nguyenthithanh@volex.com

Jurisdictions in the Americas

United States	VP, HR Americas	emily.rice@volex.com
Mexico	HR Manager, Tijuana	elena.quiruz@volex.com
Canada	VP, HR Americas	emily.rice@volex.com

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Appendix 2 – Our Data Retention Principles

Speculative Applications

Any data that you share with the Company as part of a speculative application will be retained for a maximum of 12 months before it is deleted.

Unsuccessful candidates

Any data collected about you during the recruitment process will be deleted once the recruitment process is completed and will be held no longer than 6 months after the recruitment process is completed.

Successful candidates

If you are successful in the recruitment process and join Volex as an employee then the personal data collected during the recruitment process will be transferred to your personal file and retained during your employment. Our retention principles for employee data are set out in a separate data privacy statement.