

# Bakkafrost Scotland Recruitment Privacy Notice

## 1. Policy Statement

This is the Privacy Notice of Bakkafrost Scotland Limited (SC107275) ("**BFS**", "**we**", "**our**", "**us**"). BFS is part of the P/F Bakkafrost group. When we collect and use your personal data in the ways outlined in this Privacy Notice, we are the data controller for the purposes of data protection legislation.

We have prepared this Privacy Notice to assist you in understanding what personal data we collect about you when you apply for a role with BFS and how that information is used by us, and third parties as part of the relationship we have with you as an applicant. We are committed to being transparent about how we collect and use your data and to meeting its data protection obligations.

It is important that you read and retain this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

If you have any queries in relation to this Privacy Notice, how we process Personal Data, please contact: Lisa Connell, Head of HR:

- Post: 28 Drumsheugh Gardens, Edinburgh, EH3 7RN
- Email: [hrcentral@bakkafrost.com](mailto:hrcentral@bakkafrost.com) or
- Tel: 0131 718 8500

The following terms are used in this Privacy Notice:

- "**personal data**" means any information identifying you as a specific individual. It can identify you directly from that information alone or indirectly in combination with other information we hold or can reasonably access. Truly anonymous information is not personal data. As well as identifying you as a specific individual, to be personal data, the data must also relate to you.
- "**special category personal data**" means personal data revealing your racial or ethnic origin; political opinions; religious or philosophical beliefs, or trade union membership, and the processing of genetic data; biometric data; data concerning health or a natural person's sex life; sexual orientation; or biometric or genetic data.
- "**criminal offence data**" means personal data relating to the alleged commission of offences by you; or proceedings for an offence committed or alleged to have been committed by you or the disposal of such proceedings, including sentencing.
- "**data protection legislation**" means the Data Protection Act 2018 (DPA 2018); the UK GDPR as referred to in section 3(10) (as supplemented by section 205(4)) of the DPA 2018; the Data (Use and Access) Act 2025; and any other applicable data protection legislation applicable in any part of the United Kingdom.
- "**data controller**" means the organisation who decides why personal data is to be collected and how it will be used and treated.
- "**ICO**" means the UK Information Commission's Office, the UK regulator for data protection issues.

## 2. The data BFS collects, how, why and how used and shared

The schedule summarises the information we may collect and retain, up to and including a) the shortlisting stage of the recruitment process and b) the additional information we collect before making a final decision to make an offer of employment.

The schedule also details how and why we do this, how your data is used and with who it may be shared. It is important that the personal data we hold about you is accurate and up to date and you must keep us informed if your personal data changes.

## 3. Who has access to your personal data?

**International transfers:** Your personal data will usually be stored inside the UK or the EEA. We may transfer data outside the UK or the EEA where our service providers host, process, or store data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by an adequacy regulation or we put in place other appropriate safeguards such as an international data transfer agreement.

**Internal:** Your information may be shared internally within BFS as appropriate, including with members of the HR, Finance and Payroll teams and authorised managers.

**Group structure:** BFS is part of a group structure. BFS may also share your data with its parent company P/F Bakkafrøst registered in the Faroe Islands. An adequacy regulation has been issued for the Faroe Islands by the ICO and such transfers do not require any specific authorisation in that regard.

**Compliance with law and court orders:** We will also provide your personal data to third parties where there is a legal obligation to do so, for example to regulators, government departments, law enforcement authorities (such as Police Scotland), tax authorities and any relevant dispute resolution body or the courts or where a court order mandates disclosure.

**Background check providers and agencies:** We may use background check providers to conduct certain checks and we will require to pass your personal data to those providers. For example, Experian who implement checks into employment history and any previous involvement in or support of animal rights activist groups; credit reference agencies; criminal record checks; driving licence checks.

**Government agencies:** We will use the Home Office Right to Work Employer Service to check your Right to Work in the UK.

**Third party providers:** We contract with third party service providers and suppliers (including contractors and designated agents) to deliver certain services. Our service providers change from time to time. We use the following categories of providers: document storage; and IT, hosting and software providers. We currently use a third party platform to accept and manage job applications and that it hosted and supported by a third party.

**Restructure:** BFS may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the personal data shared will be subject to confidentiality arrangements.

**Authorised third party:** We will provide information about you to any other person who is sufficiently authorised to act on your behalf.

**Audits:** There may be instances where your personal data is reviewed as part of an audit or review process by a third party auditor.

## 4. How long does BFS keep your personal data?

We keep your personal data for no longer than is necessary for the purposes of recruitment. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and its purpose.

We will keep recruitment information (including interview notes, assessment documents) for no longer than is reasonable, after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept. If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

## 6. Your rights

As a data subject, you have several rights in relation to your personal data. These are listed below. A fee will not generally be charged for exercising any of these rights unless your requests are manifestly excessive.

- The right to access information about the personal data BFS is processing and to obtain a copy of it.
- The right to request BFS to change incorrect or incomplete data.
- The right to request BFS to erase or stop processing your data.
- The right to object to the processing of your data where BFS is relying on its legitimate interests as the legal ground for processing. In some cases, we may demonstrate that we have compelling legitimate grounds to Process your information which override your rights and freedoms.
- The right 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.
- The right to request the transfer of your personal data to you or to a third party. This right only applies to automated information which you initially provided consent for us to use.
- When we are relying on consent to process your personal data, you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

We may need to request specific information from you to help us confirm your identity as a security measure. We may also contact you to ask you for further information in relation to your request to speed up our response. If you believe that BFS has not complied with your rights, you can complain to the Information Commissioner. Contact details are available at [www.ico.org.uk](http://www.ico.org.uk).

## 7. What if you do not provide personal data?

If you fail to provide data when requested, which is necessary for us to consider your application, we will not be able to process your application successfully.

## 8. Changes to this Privacy Notice

BFS reserves the right to update this Privacy Notice at any time and will provide you with a new notice when making any substantial updates.

## 9. Automated Decision-Making

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention.

We may use automated decision-making processes in certain circumstances during recruitment. Automated decision making is only allowed when we have a legal reason for this type of decision-making.

We make the following decisions based solely on automated processing:

- **Right to Work in the UK.** If you apply for a role for which we do not provide visa sponsorship, your application may be automatically rejected if you do not have the legal right to work in the UK or require visa sponsorship.
- **Working Time Regulations.** If you are under 18 and apply for a role that would result in a breach of the Working Time Regulations 1998, your application may be automatically rejected.

Our use of automated decision making could legal, or similarly significant, effects for you in that it potentially restricts your access to employment.

In BFS's recruitment process, automated decision-making is used to comply with legal employment requirements and because it is necessary for the performance of the contract (or potential contract) between BFS and the candidate. Therefore, there is a justification that an exemption can be applied.

If an automated decision is made about you, you have the following rights:

- To request an explanation of the decision.
- To request human intervention in the decision-making process.
- To express your point of view and contest the decision.

You can exercise your rights in accordance with Section 6 above.

## 10. Monitoring and Review

This policy was last updated in December 2025 and will be monitored and reviewed, at least every two years.

### Schedule 1

#### Part A: Data Processing - Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information (legal basis)	How we use and may share the information
<b>Your name and contact details (i.e. address, phone numbers, email address)</b>	From you and/or a recruitment agency	To perform a contract or take steps at your request, before entering into a contract	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome  To inform the relevant manager or department of your application
		With your prior consent only.  You can set preferences as to the location and type of job you are interested in hearing about.  You can unsubscribe	To send you job alerts if you sign-up to this.

The information we collect	How we collect the information	Why we collect the information (legal basis)	How we use and may share the information
		from these alerts at any time (please see the section outlining your rights above).	
		To perform a contract or take steps at your request, before entering into a contract	To manage your account on our recruitment platform
		With your prior consent only.	To advise you of similar alternative or new vacancies if you have given us permission to do so.
		We are required by law to inform you if we will change the way we use your data.	To notify you of any changes to this privacy notice.
<b>Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests</b>	From you and/or from a recruitment agency	To perform a contract or take steps at your request, before entering into a contract	To make an informed recruitment decision
<b>Details of your referees</b>	From you and/or from a recruitment agency or from our background check providers	To perform a contract or take steps at your request, before entering into a contract  In the regulated sector, to comply with our legal obligations to obtain regulatory references	To carry out a fair recruitment process  To comply with legal/regulatory obligations  Information shared with relevant managers, HR personnel and the referee
<b>The information you have provided to us in your CV and covering letter</b>	From you and/or from a recruitment agency	This is necessary for the potential employment contract or to take steps to enter into an employment contract	To assess your skills, qualifications, and suitability for the role.

The information we collect	How we collect the information	Why we collect the information (legal basis)	How we use and may share the information
		<p>We ask that you do not provide us with special category personal data or criminal offence data within your CV and covering letter.</p>	
<b>Details of your online presence</b>	<p>Your social media account and from other online public resources; from background check providers</p>	<p>We process this on the basis of our legitimate interests of understanding and assessing your suitability to the role.</p> <p>If we inadvertently come across any criminal offence data we will use this to on the basis that it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us in connection with employment e.g. to ensure health and safety if others.</p>	<p>To allow us to assess your and suitability for the role.</p>
<b>We may collect information in relation to your health</b>	<p>From you and/or from a recruitment agency</p>	<p>We are legally required to do this in accordance with the equalities legislation.</p> <p>This is special category personal data as it is in relation to your health. We will process this data on the basis that it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us in connection with employment.</p>	<p>We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.</p>

The information we collect	How we collect the information	Why we collect the information (legal basis)	How we use and may share the information
<p><b>Data related to any dietary requirements you have and this may disclose special category personal data about you e.g. health data (allergies or health requirements), religious or philosophical beliefs, ethnic origin data.</b></p>	<p>From you</p>	<p>Our legitimate interests of keeping you safe.</p> <p>This is special category personal data on the basis that it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us in connection with employment.</p>	<p>If there are catering requirements at an interview or assessment day</p>
<p><b>Bank account details</b></p>	<p>From you</p>	<p>Our legitimate interests in paying you for your travel.</p>	<p>If in exceptional circumstances, we agree to pay your travel expenses for attending an interview then we may require a note of your bank account details. It is not our standard policy to pay travel expenses.</p>
<p><b>If you attend our premises for an interview then you may be recorded by the CCTV cameras outside our office and you will be asked to complete our visitors book.</b></p>	<p>From our CCTV system or from you</p>	<p>We are legally required to ensure the safety of our visitors.</p> <p>We used CCTV on the basis of our legitimate interests e.g. to prevent and detect crime.</p>	<p>This is for fire and safety regulation purposes and for the detection and prevention of crime.</p>

**Part B: Data Processing - Before making a final decision to offer a role**

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p><b>Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers</b></p>	<p>From you or from a recruitment agency or from our background check providers</p>	<p>To perform a contract or take steps at your request, before entering into a contract</p> <p>To comply with our legal obligations</p>	<p>To obtain the relevant reference about you</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers and HR personnel</p>
<p><b>Information regarding your academic and professional qualifications</b></p>	<p>From you, from your education provider, from the relevant professional body</p>	<p>To perform a contract or take steps at your request, before entering into a contract</p>	<p>To make an informed recruitment decision</p>
<p><b>Information regarding your criminal record</b></p>	<p>From you or from a recruitment agency</p>	<p>To perform a contract or take steps at your request, before entering into a contract</p> <p>For performing or exercising obligations or rights imposed or conferred by law on us in connection with employment</p> <p>For reasons of substantial public interest[ (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector, and protecting the public against dishonesty)</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with Disclosure Scotland, the DBS and other regulatory authorities as required</p>
<p><b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information</b></p>	<p>From you and, where necessary, the Home Office</p>	<p>For performing or exercising obligations or rights imposed or conferred by law on us in connection with employment</p> <p>To comply with our legal obligations</p>	<p>To carry out legal right to work checks</p> <p>Information will be shared with the Home Office as required.</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<b>A copy of your driving licence and or live endorsements</b>	From you or from our driving checks provider	<p>For performing or exercising obligations or rights imposed or conferred by law on us in connection with employment</p> <p>To comply with our legal obligations</p> <p>To comply with the terms of our insurance</p>	<p>To make an informed recruitment decision</p> <p>To ensure that you have a clean driving licence</p> <p>Information may be shared with our insurer</p>
<b>Tax and payroll information from your old employer (P 45)</b>	From you or from HMRC	<p>To perform the employment contract including payment of salary and benefits</p> <p>To comply with our legal obligations</p>	<p>To ensure you receive the correct pay and benefits</p> <p>Information shared with our Finance and Payroll teams and with (HMRC)</p>
<b>If we would like to offer you the role, you may be required to complete a medical questionnaire if relevant to the role.</b>	From you or from medical professionals	This is necessary for the employment contact. The processing is necessary for the purposes of carrying out our legal rights and obligations in connection with the employment relationship.	This helps us ascertain that you are fit to undertake your contractual role whilst ensuring that we provide adequate support in terms of health and safety provision.