# **Candidate Privacy Notice**

## WHAT IS THE PURPOSE OF THIS RECRUITMENT INFORMATION NOTICE?

This notice explains how Ingredion uses personal information about job applicants. Ingredion is responsible for deciding how we hold and use personal information about you. You are being provided with this recruitment information notice because you are applying for work with us (whether as an employee, worker or contractor). This Notice applies to applications submitted via Ingredion's careers website, including via the third-party system named Workday; through other recruitment routes, such as recruitment agencies, job boards and other means, such as by post or email. This Notice is to make you aware of how and why your personal information will be used, 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 under the General Data Protection Regulation ((EU) 2016/679) (GDPR) and applicable law of European Union countries and/or the UK, where relevant.

### **DATA PROTECTION PRINCIPLES**

We will comply with data protection law and principles in relation to your personal information, which means that:

- We will use your personal information lawfully, fairly and in a transparent way.
- We will collect your personal information only for valid legitimate business purposes that we have clearly
  explained to you, and we will not use that recruitment information in any way that is incompatible with
  those purposes.
- We will use your personal information as is relevant to the purposes we have told you about, and which is limited only to those purposes i.e. not excessive.
- We will keep your personal information, accurate and up to date.
- We will keep your personal information only for as long as is necessary, for the purposes we have told you about.
- We will keep your personal information secure; we protect it against accidental or unlawful destruction
  or accidental loss, alteration, unauthorised disclosure or access, using appropriate technical and
  organisational measures; we process it in accordance with your applicable legal rights.

## THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your CV and covering letter or email.
- The information you have provided on our application form which will generally tell us who you are and help us decide if you are suitable for certain positions within the organisation. This type of information may include: your name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, previous employment history, personal interests, information about the type of work and projects you have been involved with and any other information you may wish to provide to us as part of your application.

- Any information you provide to us or collected, during an interview or otherwise for example information
  contained in your social media accounts or personal websites or other online accounts (e.g. LinkedIn or
  Twitter); information as your performance at assessment centres and information provided by your
  referees; performance and behavioural evaluations to the extent permitted by applicable law;
- Future opportunities information: This is information collected in order to keep in touch with you about future job opportunities at Ingredion, such as your name, email, location, field of expertise and the kind of role you are interested in;
- Careers website information: This is information related to your use of Ingredion's careers website or the
  website of the third-party service provider which Ingredion uses (eg Workday); for example your IP
  address. This information may be collected using cookies and similar technology. For more information
  about how Ingredion uses cookies and similar technologies please see Ingredion's Website Privacy Notice.

We may also collect, store and use the following types of more sensitive personal information, as permitted by applicable law:

- Information about your race or ethnicity, citizenship, and sexual orientation
- Information about your health, including any medical condition, health and sickness records.

#### **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about candidates from the following sources:

- You, the candidate (for example when you provide information as part of your application or during the recruitment process);
- the recruitment agency, from which we collect the following categories of data: your cv, name, address, date of birth, previous roles, copy of passport, reasons for wanting to change roles or work.
- background check provider, for example a country's immigration authority, from which we collect details
  of your right to work or live in a particular country;
- Your named referees, from whom we collect a reference details such as your previous employer/contractor, details of the role or work carried out (e.g. job title) and the dates during which you were employed or carried out that work / project;
- The data from third parties from a publicly accessible source: for example, LinkedIn, or other business or employment-oriented services that operate via websites where you have added information about yourself; publications which you have written/contributed to, and which are publicly available.

# HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work or position, and generally to process your application;
- Security management, including carrying out background and reference checks, where applicable (including European and international anti-terror lists to the extent these checks go beyond any statutory obligations applicable to us or any of our Ingredion Group Companies)
- Communicate with you about the recruitment process, including where applicable arranging travel / accommodation / travel cost payments, in respect of the interview process.

- Communicate with relevant Ingredion employees about the recruitment process, and also with the recruitment agency that referred you to us;
- Keep records related to our hiring processes, and where applicable to further develop or improve any of our recruitment processes, including as to whether our careers website is user-friendly and contains appropriate and helpful information;
- Comply with legal or regulatory requirements, such as compliance with health & safety requirements and
  other legal or fiscal obligations, or in connection with litigation or an internal investigation or audit, as well
  as equal opportunities monitoring; security checks and comparisons with European and/or international
  anti-terrorist lists as far as legally permitted;
- Enrichment of our data, including through usage or research of publicly available data to the extent this may be required;
- Carry out relevant benchmarking, in particular as to the salary and other benefits which you may be offered as part of the role or work
- Enable you to participate in scoring systems or short list or automated decision-making processes, where applicable (although note that Ingredion does not rely completely on any automated decision-making process in recruiting for positions within the business)
- Building and plant security (e.g. through access controls and video monitoring); IT Security; compliance with health & safety requirements.

Ingredion may verify the personal information you provide and/or collect personal information about you from third party sources to assist with "Pre-Employment Checks". If this occurs:

- You will be told in advance which aspects of your personal information will be verified including an explanation of how the Pre-Employment Checks will be carried out; and
- Personal information about criminal convictions (if collected) or medical information will only be collected through official authorised sources and in accordance with applicable law.

Ingredion may also require you to undertake drug and alcohol testing prior to commencing employment, in accordance with applicable law.

It is in our legitimate interests to decide whether to appoint you to a role or work, since it would be beneficial to our business to appoint someone to that role or work. Ingredion may also process your Recruitment Information to comply with its legal obligations. We also need to process your personal information to decide whether to enter into a contract of employment (or otherwise) with you. Ingredion may process personal information relating to gender, race, ethnic origin or physical or mental health, where the processing is required to comply with local law and/or necessary to identify or keep under review the existence or absence of equality of opportunity or treatment

At other times, Ingredion will be processing your personal information because you have consented to Ingredion doing so. In which case you can withdraw such consent at any point.

## If you fail to provide personal information

You only need to provide personal information that is necessary for processing your application or for a pre-contractual relationship with us, or where we are required to collect the information, by law. Without this information, we are generally not able to continue the job application process or the selection procedure. 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 and continue with the application process. For example, if we require a credit check or references for this role or work and you fail to provide us with relevant details, we will not be able to take your application further. If we request personal information from you, which is more than is necessary as referred to above, we will tell you separately, that this additional information is provided by you on a voluntary basis.

### HOW WE USE "SENSITIVE" PERSONAL INFORMATION

We will use your particularly sensitive personal information in the following ways:

- 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 a
  test or interview or otherwise.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- Details of trade union membership may be processed to ensuring that any relevant rights that you may
  have in connection with any Trade Union membership are complied with, as required to enable us to meet
  our obligations under any applicable employment law and to administer any Trade Union subscriptions paid
  direct from your salary.
- Documentation such as work permits, details of residency, and proof of citizenship will be processed to
  assess and review eligibility to work for the relevant Ingredion company in the relevant country, or the
  relevant country in which you work.

## INFORMATION ABOUT CRIMINAL CONVICTIONS

We do not envisage that we will process information about criminal convictions as part of the recruitment process.

# **AUTOMATED DECISION-MAKING**

We do not currently rely on automated decision making. We may carry out a small amount of profiling from time to time related to assessment of performance and potential as part of our recruitment, appraisal process or other career development programmes. This is used for development and may be considered for promotion or succession planning but is not used as the sole basis for any decision. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## **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 (for example Workday): other companies within the Ingredion Group (for example the Ingredion company offering the position that you are applying for); the recruitment agency which sent us your details (the recruitment agency may conduct screening and verification of your application as well as check other information you have provided, for example to check academic and professional qualifications); external organisations which we use in order to do profiling. All our third-party service providers and other Ingredion Companies are required to take appropriate security measures to protect your personal information. We do

not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Your personal information may transferred to Ingredion offices/people in countries outside the European Economic Area EU/EEA ("third party state") whenever such is necessary to meet a contractual obligation towards you, or in order to process your application and manage the recruitment process (e.g. application for a job in another country; or the position involves managing people in another country; or being managed by someone in that country; or the position you are applying for means managers in a third party state have a need to know about your personal information). It is in our legitimate interests to decide whether the nature of the role or work, would involve Ingredion offices/people, in other countries.

In addition to our third-party service providers, Ingredion will only disclose your personal information outside of the Ingredion Group:

- when required to do so by law;
- in response to a legitimate request for assistance by a relevant law enforcement agency; and/or
- to seek legal advice from Ingredion's external lawyers, or in connection with litigation with a third party.

# Where is my recruitment information stored?

Note that, your personal information gained during the recruitment process, may be transferred to, processed in and/or stored in countries outside of the country where you live, by Ingredion or our service providers (for example for profiling). The countries may have less strict, or no data protection laws. If you are resident in the UK or a country within the EEA, if no decision has been issued by the EU Commission regarding the presence of a reasonable level of data protection for the respective country to which your personal information is to be transferred, we confirm that your rights and freedoms will be reasonably protected and guaranteed in accordance with EU/UK data-protection requirements through contractual agreements to this effect. We will take legally required steps to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this Notice. If you are located in the EEA, you can request information on details of these arrangements from Recruiting@ingredion.com.

# **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 on our instructions and they are subject to a duty of confidentiality. Recruiting@ingredion.com can provide you with further information if you need it.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

# **DATA RETENTION**

# How long will you use my recruitment information for?

We process and store your personal information for the duration of your application as part of our recruitment process. If you are unsuccessful in your application with us (or if you reject the position), Ingredion will retain your recruitment personal information for no longer than is necessary for the specific recruitment process, and in accordance with our internal retention policies and procedures, and applicable law. For example, for data subjects who are covered by the GDPR (or equivalent local law in the EU/UK) your personal data is kept for a period of six months after we have communicated to you that your application was not successful or you have declined the position. We retain your personal information for the relevant retention 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 the relevant period, we will securely destroy your personal information in accordance with our data retention policy, or applicable laws and regulations.

If you are unsuccessful in your application with us (or if you reject the position), but you would like us to retain your personal information on file for longer, on the basis that if another opportunity arises in future, you would like to be considered for that position, please let us know in writing – so that Ingredion or one of our third party service providers, can contact you. Our policy is to allow the extension of time for up to 12 months.

# RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

# Your rights in connection with personal information

Under certain circumstances, by law you may 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 (or those of a third party) and there is something about your 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 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 Recruiting@ingredion.com in writing. Any request to exercise one of these rights will be assessed by us on a case by case basis. There may be circumstances in which Ingredion is not legally required to comply with your request or because of relevant legal exemptions provided for in applicable data protection legislation.

As referred to above, you may have the right in certain circumstances, to file an objection at any time against the processing of your personal information. If you file an objection, we may not be able to continue to process your personal information – but in some cases we will still be able to: for example, if our use of your personal information outweighs your interests or the processing serves the purpose of asserting, exercising or defending legal claims. You can, of course, withdraw your application at any time.

We will not use your personal information gained through the recruitment process, to carry out any direct advertising.

### **RIGHT TO WITHDRAW CONSENT**

In some circumstances, where you have applied for a role or work, you may have provided consent to us, to enable the processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact Recruiting@ingredion.com. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information and, subject to our retention policy, we will dispose of your personal information securely. Note that in some cases, this may affect our ability to continue to process your application.

### **DATA PROTECTION OFFICER**

Ingredion Germany GmbH has data protection officer (DPO). HEC Harald Eul Consulting GmbH, Data Protection Officer of Ingredion Germany GmbH, Auf der Höhe 34, 50321 Brühl, Germany, E-mail: DSB-Ingredion-Germany@he-c.de. If you have any questions about this privacy notice or how we handle your personal information, please contact Recruiting@ingredion.com. Depending on the data protection law applicable to you, you may have the right to make a complaint at any time to the relevant supervisory authority for data protection issues. For example, in the UK this is the Information Commissioner's Office (ICO) (https://ico.org.uk/make-a-complaint/).

#### **CONTACT DETAILS**

If there is an error in your application (including an personal information which you have provided to us); or you have any questions about this Notice; or would like to access the information it contains in a different format; or you want to extend the time for which Ingredion will hold your personal information is you are not hired for a particular position or work; or you believe your privacy rights have been violated, please contact Recruiting@ingredion.com.