

## **GENERAL DYNAMICS UK LTD NOTICE TO APPLICANTS REGARDING THE PROCESSING OF PERSONAL DATA**

General Dynamics United Kingdom Ltd (GDUK) and its operating groups, subsidiaries and divisions within the United Kingdom, (the “**Company**”) are committed to protecting the privacy and security of Personal Data and/or Personal Data (“Personal Data”) of prospective employees (“Applicants”). The Company collects, processes, and transfers Personal Data of global employees in connection with its human resources, training and security vetting activities. The Company is committed to complying with the UK General Data Protection Regulation; and all data protection laws, employment and labour laws, and collective agreements in the countries in which it employs employees and does business.

The contact information for the Company’s Data Protection Officer (“DPO”) is:

Paul Amos, Snr Data Privacy & Records Retention Manager. Unit 1 & 3, Oakdale Court, Bryn Brithdir, Oakdale Business Park, Blackwood NP12 4AD. Tel 07747 216521.  
[paul.amos@gd-ms.uk](mailto:paul.amos@gd-ms.uk)

### **PERSONAL DATA PROCESSED**

The Company collects, processes, and stores Personal Data regarding Applicants for the purposes detailed below in connection with its human resources, training and security vetting activities. The Personal Data we hold and process will be used for management and administrative use. The Company will keep and use the information to enable it to run the business and manage its relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for the Company, at the time when your employment ends and after you have left. This includes using information to enable the Company to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect the Company’s legal position in the event of legal proceedings. Further information on why we process your Personal Data is set out below. If you do not provide this data, the Company may be unable in some circumstances to comply with its obligations and will tell you about the implications of that decision.

- **Recruitment:** The Company processes Personal Data of Applicants such as name; contact information, education, language(s) and special job-related competencies; certification information; employment history; work experience; military service information; background check information to the extent that such checks are possible under applicable law; and criminal convictions and offences, insofar as this information is relevant for the specific position, to fulfill its legitimate interest and legal obligations in employing the most qualified Applicants. The processing of criminal convictions and offences data in connection with the Company’s

security vetting activities will be carried out only under the control of official authority or when authorised by UK law. The Company may collect recruitment-related Personal Data from third parties such as recruiters, background check companies, government authorities, former employers and references you provide. The Company may also collect Personal Data from publicly accessible sources such as public and job-related social media profiles.

- Equality and diversity: The Company processes Personal Data such as racial or ethnic origin, gender; disability information, and other characteristics protected by law to comply with obligations and specific rights in the field of employment and social security and social protection law in so far as such processing is authorised by UK law or a collective agreement, and to fulfill the Company's legitimate interest in maintaining a diverse workplace free from improper discrimination, and in order to administer the contract of employment.
- Health and safety: The Company processes Personal Data regarding medical or health conditions, drug testing, health insurance for the purposes of preventive or occupational medicine, assessments of your working capacity, medical diagnosis, the provision of health or social care or treatment and management of health or social care systems and services. This information is processed for the protection of your vital interests or the vital interests of another person and to comply with obligations and specific rights in the field of employment and social security and social protection law in so far as it is authorised by UK law. This information may also be processed pursuant to a collective agreement and legal obligations to provide a safe workplace. The Company may collect such information from third parties such as health care providers and third-party benefits administrators and government authorities.
- Defence of legal claims: The Company processes Personal Data necessary for the establishment, exercise or defence of legal claims.

## **RECIPIENTS OF YOUR PERSONAL DATA**

Your Personal Data will be disclosed to:

- Management, HR personnel, security personnel and IT personnel who have a need to know about your Personal Data.
- Management, HR personnel, security personnel and IT personnel located at the Company offices in Oakdale, Merthyr Tydfil and Hastings who have a need to know about your Personal Data.

- Management, HR personnel, security personnel and IT personnel located at the Company offices in Oakdale, Merthyr Tydfil and Hastings have implemented appropriate safeguards for the transfer of your Personal Data to Canada and US and other countries outside of the UK as permitted under a finding of adequacy or through standard contract clauses under Article 46 (2). Further information regarding these safeguards can be obtained from your local HR representative or the DPO.
- Third party processors such as recruiters, background check companies, government agencies and others who have a need to process your Personal Data in connection with your recruitment employment with the Company as part of the operation of the business. Currently these third parties are named at Annex A to this document.

To the extent that such third-party processors are in a country without adequacy regulations, the Company has implemented appropriate safeguards for the transfer of your personal information to these countries through standard contract clauses under Article 46 (2). Further information regarding these safeguards can be obtained from your local HR representative or DPO.

- Additionally, the Company may be required to disclose Personal Data in response to lawful requests by public authorities to comply with national security or law enforcement requirements.

## **RETENTION OF YOUR PERSONAL DATA**

The Company and any applicable third party processors will retain your Personal Data for (1) the period of time that it is necessary to process your Personal Data for the purposes for which it was collected and processed, (2) the period required under record retention laws, (3) the applicable statute of limitations for employment or discrimination claims, or (4) the necessary period of time to establish, exercise, or defend legal claims. Please refer to the Company's Retention Policy, via the GDUK Business Process Library, for more information. Generally, for unsuccessful applicants, the Company and applicable third-party processors will delete your Personal Data upon completion of the application and employment decision process subject to unless you specifically request the Company to retain your Personal Data for further consideration.

The Company will retain the personal data of unsuccessful applicants for a period of 12 months following the conclusion of the recruitment process. This is to enable us to maintain proper recruitment records in line with our legal obligations.

If you have provided your explicit consent, we may retain your data for longer, so that we can consider you for future employment opportunities within our organisation. You may

withdraw this consent at any time by contacting us using the details provided in this notice.

## **YOUR RIGHTS REGARDING YOUR PERSONAL DATA**

As a data subject, you have the following rights regarding your Personal Data:

### **Right to Access and Correct your personal information:**

The Company aims to ensure that all personal information is correct. You also have a responsibility to ensure that changes to your personal information are notified to the Company as soon as possible so that we can ensure that your data is up to date.

You have the right to request access to any of your personal information that the Company may hold, and to request correction of any inaccurate data relating to you.

You should note that we do not always need to comply with your requests, but we will ensure that this is explained to you if this is the case.

### **Right to Rectification or Erasure of personal information:**

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- you have made a successful objection (see right to object); or
- it has been processed unlawfully; or
- it is necessary to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

### Right to Restrict Processing:

You have the right to restrict our processing of your personal information but only where:

- you contest the accuracy of the personal information, pending us taking sufficient steps to correct or verify its accuracy;
- the processing is unlawful, but you do not want us to erase the data;
- we no longer need the personal information for its original purpose, but we require it for the establishment, exercise or defence of legal claims; or
- you have objected to processing justified on legitimate interest grounds (see below), pending verification as to whether the Company has compelling legitimate grounds to continue processing.

Where personal information is subjected to restriction in this way, we will only process it with your consent; for the establishment, exercise or defence of legal claims; or to protect the rights of another natural or legal person.

### Right to Portability:

Where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the reason or legal ground for processing, and that personal information is processed by automatic means, you have the right to receive all such personal information which you have provided to the Company in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.

### Right to Object:

Where the reason for processing your personal information is our legitimate interests, you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as the legal ground for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

### Rights in relation to Automated Decision-Making, Including Profiling:

Where automated decision making (including profiling) is permitted under applicable laws, you have the right to obtain human intervention, to express your point of view, and to contest the automated decision.

## QUESTIONS AND COMPLAINTS

Questions or complaints regarding the processing of your Personal Data should be directed to your hiring contact in the first instance. If the enquiry cannot be answered or the complaint is not resolved locally, please direct the matter to the Company by letter, telephone or email to the Company's Data Protection Officer whose contact details are set out above.

You have the right to lodge a complaint with the Information Commissioner's Office which is situated at:

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Or by telephone on **0303 123 1113**, or find more details at [www.ico.org.uk](http://www.ico.org.uk)

If in the future the Company intends to process your Personal Data for a purpose other than that which it was collected the Company will provide you with information on that purpose and any other relevant information.

## **Annex A**

Your personal information may be accessed by third parties, including suppliers, advisers, national authorities and government bodies – see external recipients in the table below. We have sought to identify these parties in this Notice.

Where these third parties (or any others) act as a data processor (for example, a benefits provider), they carry out their tasks on our behalf and upon our instructions for the reasons that we have set out in this Notice. In this case your personal information will only be disclosed to these parties to the extent necessary to provide the required services.

External recipients of your personal information may include:

- service providers,
- tax authorities,
- regulatory authorities,
- insurers,
- bankers,
- IT administrators,
- lawyers,
- auditors,
- investors,
- law enforcement and/or other emergency services,
- consultants and other professional advisors,
- payroll providers,
- administrators of our benefits programs, and
- our Customers

Personal information contained in our IT systems may be accessible by providers of those systems, their associated companies and sub-contractors (such as those involved with hosting, supporting and maintaining the framework of our HR information systems).

We expect these third parties to process any data disclosed to them in accordance with the contractual relationship we have with them and applicable law, including with respect to data confidentiality and security.

In addition, we may share personal information with national authorities in order to comply with a legal obligation to which we are subject. This is for example the case in the framework of imminent or pending legal proceedings or a statutory audit.