

# Recruitment Privacy Policy

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The EU General Data Protection Regulation (GDPR) applies to companies that process data of EU residents. This covers EU organisations and non-EU companies that offer goods or services to EU residents or monitor their behaviour.

As part of any recruitment process, Aurora collects and processes personal data relating to job applicants.

Aurora takes the privacy of our candidates seriously and we are committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This document is complementary to our top level GDPR Policy Document and specifically for recruitment and published on our website.

## Terminology

Term	Meaning
ATS	Application Tracking System, where personal data from Data Subject(s) are stored and processed
DC	the Data Controller, who is the Employer or the recruiter(s) that collect candidate information for recruiting purposes
DS	the Data Subject, who is the Candidate EU resident considered for open roles
DPO	the Data Protection Officer, who is the responsible of the data protection for the data controller
EU	European Union
GDPR	General Data Protection Regulation
Partner companies	LSE Space, SSC
Prime/Subcontractors under current ESA Frame Contract	ATG Europe, Vitrociset Belgium

### 1. Legitimate interest in processing personal data

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you. In some cases, we need to process data to ensure that we are complying with its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the EU or UK before employment starts.

Aurora has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

Rarely we may also need to process data from job applicants to respond to and defend against legal claims.

If your application is unsuccessful, Aurora may keep your personal data on file in case there are future employment opportunities for which you may be suited. Upon informing you of not obtaining the position we will also request your consent to maintain your data.

## 2. How we receive information and how we may use it

### 2.1. You apply to Aurora

Aurora mainly receives your personal data when you apply directly for an advertised role via our website; when you apply directly to be a candidate for whom we can facilitate a job search; or via a third party when you respond to a job post placed by Aurora on a job board on behalf of a third-party client (LinkedIn, Space-careers, etc...).

When you proactively apply with Aurora, you provide us with your personal data. Because job applications correspond to actual (or potential, in case of open applications) job openings, we have legitimate interest in processing this data and we do not need to ask you for explicit consent. This mainly means that you automatically AGREE to consent us collecting and storing your personal information, which will be used for recruitment purposes only. We will never process irrelevant data (e.g. cultural information) for recruiting process.

During telephone conversations and face to face interviews we may collect personal information regarding employment preferences, strengths and work experience which may be stored on your personal record. This information facilitates our ability to support your job search and to provide a basis for recommendation when short-listing candidates for a particular role. By applying proactively with Aurora, you are providing permission for our storage of this information.

Aurora will never share personal information or a Curriculum Vitae with a third party without your explicit consent. Typical situations when we will ask you such explicit consent are: 1) when we will submit your application to our Client for its evaluation; 2) when we will share your application with our partner companies; 3) when we will send your application to our Prime/Subcontractor under current ESA Frame Contract.

If you do not consent to Aurora storing your personal data, please do not submit your Curriculum Vitae or a request for a position. We are unable to process your application without receipt of consent to process and store your personal information.

We maintain the data (see section 6) and may use this data to see whether you are a suitable candidate for future positions, in which case we shall contact you again.

### 2.2. We actively Source Candidates

Since Aurora has a legitimate interest in processing personal data (as defined in section 1), we may source candidates, meaning that we can find and store personal data without directly asking them to the data subject. Gathering data from social profiles is legal under GDPR. Sourcing is an essential function for organisations that want to find great people. For example, we may assume that a publicly accessible LinkedIn profile indicates a reasonable expectation of contact (if in the profile is not explicitly stated the contrary). Therefore, we will proceed to process candidate data for at most 30 days.

If by sourcing candidates we then decide to keep their data, we will then contact them within 30 days and say that we intend to keep data for recruitment purpose only and will provide them with our privacy policy.

## 3. Information Collected

Aurora collects a range of information about you for recruitment purposes only. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your education, qualifications, skills, experience and employment history;
- information about your availability, current level of remuneration including benefit entitlements such as company car;
- information about your entitlement to work in the EU or in the UK.

Aurora may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, application emails, internet platforms (such as LinkedIn, space-careers.com, etc...), obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We may seek information from third parties only after you have signed that you agree to the potential employment contract. We will inform you that we are doing so.

## 4. Access to data

Data will be stored in specific folders for recruitment purposes as well as in the emails used to communicate with you as a candidate. Access to these data are controlled and limited to Aurora's recruitment and management team.

As Application Tracking System (ATS) we use excel spreadsheets and store the information using Dropbox Business.

We will not share your data with third parties without your explicit consent. The nominal authorisation is a signed Candidate Proposal Form.

In case you explicitly agree to share your data with third parties, we may: 1) eventually share your data with your provided references to obtain feedbacks about you; 2) we will also share your application with our Client for its evaluation; and 3) with our partner companies and Prime/Subcontractors under current ESA Frame Contract.

## 5. Data Protection

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

## 6. Aurora will keep data for so long

Due to the nature of our business, a significant number of candidates reconnect with our organisation periodically. It is not uncommon for this to occur years after they have already applied with us in the past. For this reason and in order to be considered for other job opportunities, Aurora will **retain your personal details for a maximum of 5 years** or until you wish us to delete your records from our database or refrain from further engagement.

Prior to the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## 7. Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require Aurora to amend incorrect or incomplete data;
- Require Aurora to delete your data;
- Request third parties to delete your data.

If you would like to exercise any of these rights, please contact [privacy@aurora.nl](mailto:privacy@aurora.nl). We will process your request within 30 days.

If you are successful and become an employee, then we maintain your data in accordance to our company GDPR policy.

If you have a complaint about the way your data is stored or handled by Aurora, please contact [privacy@aurora.nl](mailto:privacy@aurora.nl). Alternatively, you can contact us by writing to us at: *Aurora Technology B.V., Zwarteweg 39, 2201 AA Noordwijk, The Netherlands.*

If you remain unhappy with the handling of your data, you can complain to the courts of the EU member state where you reside, where you work, or where the alleged infringement occurred.

## 8. Notification of Breaches

In the unlikely event that our computer systems are compromised and there is a potential loss of confidentiality we will report this breach to you.

In the unlikely event that personal data is taken or exposed from Aurora records without our consent, we will provide reports surrounding that exposure within 72 hours of being notified of such an event and take any action necessary to restore security of your personal data.

## 9. Changes to our Privacy Policy

This privacy policy may be changed by Aurora at any time. Any changes to our Privacy Policy will be updated on our website.

## 10. Aurora appointed DPO

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