



ZEUS INDUSTRIAL PRODUCTS (IRELAND) LIMITED
EFFECTIVE: SEPTEMBER 2025 | REVISION: 1
LAST UPDATED: SEPTEMBER 2025

RECRUITMENT AND JOB APPLICANTS PRIVACY NOTICE

1. PURPOSE AND SCOPE OF NOTICE

This Privacy Notice ("**Notice**") is intended to explain how your Personal Data will be handled by Zeus Industrial Products (Ireland) Limited (the "**Company**", "**Zeus**", "**we**", "**our**", "**us**"). It sets out the information including the personal information detailed below relating to you ("**Personal Data**"), that will be collected and processed by us where:

- You participate in the Company's recruitment initiative;
- You voluntarily submit your CV to us on an ad hoc basis;
- You apply for an advertised job within the Company or any of its affiliates (whether as an employee or non-employee of the Company); or
- A recruiter provides your CV to us and we arrange a job interview with you.

This notice applies to any and all job applications submitted and recruitment initiatives coordinated by the Company. If you have any questions or concerns about this notice, please e-mail dpo@zeusinc.com.

We are required to provide you with the information in this Notice which explains how your Personal Data will be processed by the Company and your data protection rights under: the EU General Data Protection (EU Regulation 2016/679) and the Data Protection Acts 1998 to 2018 ((together, "**Applicable Data Protection Laws**").

IMPORTANT: where we receive your CV via a recruiter with whom you have engaged with, we encourage you to read the relevant recruiter's privacy notice to understand how your Personal Data is processed by such a recruiter who is a controller of your Personal Data independently of the Company.

2. DATA CONTROLLER DETAILS

Zeus Industrial Products (Ireland) Ltd
IDA Business Park, Lisnennan, Letterkenny, Co. Donegal, Ireland, F92 R702
Email: dpo@zeusinc.com
Website: www.zeusinc.com

3. APPLICATION OF THIS NOTICE

This Notice applies to the way we collect and process your Personal Data from the time you provide Personal Data in an application, up to the point at which you commence employment with us (if at all). Once you commence employment, the way we process your Personal Data will no longer be dealt with under this Notice. It will instead be governed by our applicable employee privacy notice (which will be made available to you when you commence your employment with us).



4. PERSONAL DATA WE PROCESS

IMPORTANT: Please note that the below list of Personal Data we collect about you, is intended to be as complete and accurate as reasonably possible but it may be updated from time to time in accordance with section 13 of this Notice.

As part of the recruitment and job application process, we collect the Personal Data that you submit to us, which may include:

Category of Personal Data	Details
Background Data	<ul style="list-style-type: none">• Name• Title• Address• Telephone number• E-mail address• Date of birth• Nationality• Photograph• Copy of identification document / driver's Licence (where appropriate)• Any other permit required to perform the role• Gender• PPSN / social security number• Reference background check
Recruitment Data	<ul style="list-style-type: none">• Details about the job you're applying for within the Company.• Details about your existing/previous employment such as your length of service and your role.• Details about your qualifications such as your skills, education, the languages you speak (including, your proficiency), your eligibility to work in a particular country (e.g. your work permit, citizenship or visa details), your experience relevant to the job you apply for with us.• Details about your preferences such as positions you may be interested in, information about when you may be available to interview and/or start work for Company (i.e. your current notice period) or work on ongoing basis (e.g. full or part time or on weekends), whether you are open to relocation or working remotely and whether you are willing to travel for work.• Details you may provide to us in response to our queries or questions at interview stage (including information about you which we generate about you throughout the interview and/or recruitment process).• Details of your IP address, browser type, device ID, operating system, and usage data from our recruitment platform.• Details about you which we gather from publicly available sources where such searches are relevant to the job you have applied for within Company. If you apply for a position through LinkedIn, we may use the information you have previously provided via LinkedIn to populate your application.
Special Category Data	<ul style="list-style-type: none">• Disability Data: Collected where it is necessary to comply with anti-discrimination laws or to provide reasonable accommodations.

It is necessary for us to process your Personal Data in order to assess your job application and/or include you in a recruitment initiative. Ultimately, it may also be necessary for us to process your



Personal Data in order to take steps to offer and enter into a contract of employment with you. In the event that you do not wish to provide us with your Personal Data for the purposes outlined in this Notice, we will not be able to assess your job application and/or include you in a recruitment initiative and/or offer you a contract of employment.

Please note that should you include information you think is relevant to your job application or the recruitment initiative (e.g. cover letters, references from your previous employers and other documents), it is likely to contain your Personal Data. We will hold and process any such Personal Data in accordance with the terms of this Notice and Applicable Data Protection Laws.

5. Why and How we Process your Personal Data

The following table details the key context for which ("**Legal Basis**") we collect your Personal Data. It also explains how ("**Nature of Processing**") and why ("**Purposes**") we obtain and otherwise process your Personal Data. We will only use your Personal Data for the purposes for which we collect it (as outlined in this section 5), unless we reasonably consider that we need to use it for another reason and that reason is incompatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and explain the Legal Basis which allows us to do so.

Legal Basis	Nature of Processing and Purposes	Categories of Personal Data
<p>Legitimate Interests</p> <p>When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).</p> <p>You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests. For more information on exercising this right please see section 11 of this Notice, <i>Your</i></p>	<p>We will obtain, collect and otherwise process your Personal Data where it is necessary for the purpose of the recruitment process, including:</p> <ul style="list-style-type: none">• To process your job application, to contact you in relation to interviews, to interview you and/or offer you a job after the interview stage;• To assess your candidate profile against vacancies which we think may be suitable for you;• To verify details you have provided to us using third party sources;• To request information from third parties such as qualifications and references;• To carry out limited reference background checks;• To retain your information (should you be unsuccessful) in order to contact you in relation to future vacancies within the Company that may be of interest to you;• To maximise the number of potential candidates who are informed about job opportunities;• To collect feedback on and evaluate the recruitment process;	<ul style="list-style-type: none">• Background Data• Recruitment Data

<i>Data Protection Rights.</i>	<ul style="list-style-type: none"> To promote internal and external recruitment events; To establish, defend and exercise any actual or potential legal claims. 	
Compliance with Legal Obligations It is necessary to process your Personal Data in order to comply with legal obligations imposed on us as an employer under applicable Irish and European Union laws.	We obtain, collect and otherwise process your Personal Data: <ul style="list-style-type: none"> To comply with applicable Irish / European Union employment, equality and health & safety laws; To comply with other applicable Irish and European Union laws. 	<ul style="list-style-type: none"> Background Data Recruitment Data
Assessment of your Working Capacity It is necessary to process your Personal Data in order for us to determine your working capacity.	We obtain, collect and otherwise process your Personal Data: <ul style="list-style-type: none"> To assess if you are fit to work or not fit to work (e.g. where you suffer from a health condition which may affect your working capacity); and To assist you obtain adequate support after/during you have suffered from a health condition which affects your ability to attend for interview. 	<ul style="list-style-type: none"> Background Data Special Category Data

We will only use your Personal Data for the purposes for which we collect it (as outlined above), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you in accordance and we will explain the legal basis which allows us to do so.

6. Pre-Employment Medical Data

Pre-employment medical assessments may be required for certain roles. These assessments are carried out only after a conditional offer of employment has been made, and only by authorised medical practitioners. The Company will not receive any sensitive medical details - only a fitness-to-work certificate stating whether you are fit to carry out the duties required.

When we process pre-employment medical data, we rely on one or more of the following legal bases:

- Legitimate interests
- Compliance with legal obligations.
- Assessment of working capacity



7. Sources of Personal Data

Your data may be collected:

- Directly from you via job applications, interviews, assessments, and correspondence.
- Through recruitment agencies acting on your behalf.
- From third parties, such as referees or background screening providers.
- From occupational health providers for the sole purpose of assessing fitness to work.

8. Sharing of Personal Data

Depending on our reasons for processing your Personal Data, we will share it with all or some of the following recipients ("**Recipients**"):

Recipient Category	Details
Zeus	<ul style="list-style-type: none">• Other members in the Company's group.• Internal business units such as human resources, IT, finance/payroll, managers, system administrators and support staff who have advertised a vacancy within their unit or who will interview you and legal.• Our shareholders.• Our Board of Directors.
References	<ul style="list-style-type: none">• Your previous employers where you identify them as references.
Third Party Service Providers	<ul style="list-style-type: none">• Recruitment agencies.• Healthcare professionals and medical consultants.• Outsourced service providers who assist us with recruitment initiatives and campaigns (background check agencies, recruitment platforms and cloud-based HR systems).• Service providers who provide support services or require your Personal Data to perform the services requested by us (e.g. IT systems and business-related applications).
Third Party Advisors / Professionals	<ul style="list-style-type: none">• External advisors e.g. tax or legal advisors, consultants, accountants and auditors (as necessary to protect our legitimate and legal interests).
Legal / Regulatory Bodies	<ul style="list-style-type: none">• Regulatory authorities and law enforcement agencies (where we are under a duty to disclose or share your Personal Data in order to comply with any legal or regulatory obligation or request) such as government authorities and bodies, law enforcement, courts and out-of-court administrative bodies.

Please note that certain recipients will process your Personal Data for their own independent purposes (separate to the Company). In such instances, these parties are responsible for complying with Applicable Data Protection Laws and we encourage you to visit / access their privacy notices (where necessary).

9. Transfer of your Personal Data

We will transfer your Personal Data outside the European Economic Area ("**EEA**") to other members of the Company (e.g. business units within the Company's group) and other recipients (e.g. our service



providers). Certain recipients (our third party service providers and other companies within the Company's group) who process your Personal Data on our behalf are located outside the EEA in countries that do not provide an adequate level of protection to your Personal Data. For example: the USA. Where such transfers occur, it is our policy that: a) they do not occur without our prior written authority; and b) that an appropriate transfer mechanism or agreement is put in place to protect your Personal Data (e.g. an adequacy decision of the European Commission, the European Commission's Standard Contractual Clauses or other transfer mechanism approved by the European Commission, such as the EU-US Data Privacy Framework). If you would like to find out more about any such transfers, please contact dpo@zeusinc.com.

10. RETENTION OF YOUR PERSONAL DATA

Applicant Category	Details
Successful job applicants	Where you are a successful job applicant , the Personal Data generated by us and provided by you over the course of the job application/recruitment process will be retained by us for the purpose of your contract of employment. Such Personal Data will be retained in accordance with our applicable employee privacy notice (which will be available to you when you commence employment).
Unsuccessful job applicants	Where you are an unsuccessful job applicant , we will retain your Personal Data for a period of up to 18 months after you attend an interview or submit a job application for the purposes of both contacting you in relation to future vacancies within the Company which we think may be of interest to you and, for the purpose of defending potential employment equality claims which you may bring against us.

Please note that in certain circumstances, we may hold your Personal Data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that applicable laws or a relevant regulator may reasonably in our view expect or require us to retain your Personal Data.

11. Your Data Protection Rights

Depending on Applicable Data Protection Laws, you may have a number of rights in relation to your Personal Data, which are set out below. In particular, these rights include the right to object to processing of your Personal Data where that processing is necessary to carry out for our legitimate interests. Note that these rights are not absolute. You can exercise these rights by e-mailing dpo@zeusinc.com.

We will aim to respond to your request within one-month of receiving it. We may have to extend the timeline of our response by 2 further months if necessary but we will contact you if this need arises. Please also note that we may need to verify your identity when you exercise your data protection rights.

Right	Further Information
Right to Object	You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.
Right of Access	You have the right to request a copy of the Personal Data held by us about you and to access the information which we hold about you.



Right to Rectification	You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your Personal Data deleted. For example, if you exercise your right to object and we do not have an overriding reason to continue processing your Personal Data or if we no longer require your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	In certain circumstances, you have the right to ask us to restrict processing your Personal Data, including if you believe that the Personal Data we hold about you is inaccurate or our use of your Personal Data is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Information	You have a right to be provided with clear, transparent and easily understandable information about how we process your Personal Data. We give effect to this right by making this Notice available to you.
Right to Lodge a Complaint	You have the right to lodge a complaint with the Data Protection Commission (“DPC”) about our processing of your Personal Data. To do so, use the DPC’s “Raise a Concern” form . We encourage you to contact us before raising a concern with the DPC to see if we can resolve any concerns you have about our processing of your Personal Data.

12. QUESTIONS REGARDING THIS NOTICE

If you have any questions, comments or concerns about the way your Personal Data are being used or processed by the Company, please submit your question, comment or concern by e-mailing dpo@zeusinc.com.

13. CHANGES TO THIS NOTICE

If we amend this notice, in whole or part, at our sole discretion, any changes will be effective immediately upon making the revised notice available to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this Notice or otherwise disclosed to you at the time it was collected, we will notify you and you will have a choice as to whether or not we use your Personal Data in the new manner.

If we amend this Notice, in whole or in part, at our sole discretion, any changes will be effective immediately upon making the revised notice available to you.