

# Job Applicant Privacy Notice

This Privacy Notice explains what information is collected about you, why it is needed, how it is used, how it is stored, how long it is kept and what measures are in place to keep personal information secure.

The Company is aware of its obligations under the General Data Protection Regulation (GDPR) and UK data protection legislation and is committed to processing your personal data securely and transparently, in manual and electronic form.

### **Definitions**

Personal information means any information relating to an identified or identifiable person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to physical, physiological, mental, economic, cultural or social identity. Personal information can be in manual and electronic form.

Processing Personal Information means any operation which is performed on personal data, whether manually or via electronic means, such as collecting, processing, recording, organising, storing, altering, consulting, using, deleting or destroying.

Data Controller refers to the Company's role in determining the processes to be used when using your personal data.

Data Processors refers to the roles given to specific staff and specific organisations to process personal data as directed by the Company.

# **Data Protection Principles**

The Company believes its collection, use and storage of personal data is consistent with its recruitment and employment requirements, as well as meeting GDPR's six data protection principles:

- 1. Personal data must be processed lawfully, fairly and in a transparent manner in relation to an individual
- 2. Personal data can only be collected for specified, explicit and legitimate purposes
- 3. Personal data must be adequate, relevant and limited to what is necessary for processing
- 4. Personal data must be accurate and, where necessary, kept up-to-date
- 5. Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing
- 6. Personal data must be processed in a manner that ensures its appropriate security

In addition, personal data will be processed in recognition of an individual's data protection rights ie their right to be informed, right of access, right for inaccuracies to be corrected, right to have information deleted, right to restrict the processing of data, right to portability, right to object to inclusion of any information and right to regulate any automated decision-making and profiling of personal data.

# Responsibilities

The Managing Director has overall and ultimate responsibility for ensuring the Company meets its obligations regarding the processing of your personal data as a data controller.

The Company ensures:

Personal information will be processed fairly and in accordance with applicable laws.

- Job applicants will be informed directly, via this Privacy Notice, about how it will use personal information.
- Personal information will only be collected and processed when it is required for a contractual reason, legitimate purpose or legal reason.
- Personal information will be relevant, adequate and not excessive for the purpose for which it is processed.
- Personal information will not be kept for longer than it is required.
- Personal information will be kept secure and access will be limited to only those that need it.
- Specific data protection responsibilities will be clearly explained to data processors and appropriate information and training will be given when required
- · Job applicants will be told how they can access personal information and exercise their rights in relation to it
- Subcontractors will demonstrate their compliance with the Company's data protection protocols



## **Types of Data Held**

Different types of personal information may be required, depending on your particular circumstances and the job you are applying for, as well as the Company's legitimate business interests and legal or contractual requirements. The following are the typical types of personal information that the Company might collect and process. Please note they are for illustrative purposes and are non-exhaustive:

Individual Information: name, address, date of birth

- Contact Information: name, address, telephone, mobile, e-mail addresses
- Suitability to Work: interview notes, passport details (or other relevant work permit details), driving licence information, records/results of pre-employment checks, records of qualifications, references
- · Information about Skills and Experience: CVs, application forms, records of qualifications, references

# **Reasons for Processing Personal Information**

We will use your contact details to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for eg we will carry out checks in relation to your right to work in the UK.

We might ask you to participate in assessment days, complete tests or occupational personality profile questionnaires and/or to attend an interview – or a combination of these. Information will be generated by you and by us during this process eg you might complete a written test or we might take interview notes. This information will be held securely by the Company.

You will also be asked to provide anonymous equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers. Any information you do provide, will only be used to produce and monitor equal opportunities statistics.

### **Data Disclosures**

The personal data you provide will be held securely by us and any relevant external services, such as recruitment agencies, whether the information is in manual or electronic form.

Job applicant personal data will be shared with staff within the Company where it is necessary for them to carry out their data processing duties. The Company may make some personal data relating to you available to those who provide relevant external services to the Company, such as recruitment agencies, based on legitimate business interests or legal reasons.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes.

# **Security of Personal Information**

The Company routinely checks its organisational and technical security measures to guard against the unauthorised access, improper use, alteration, destruction or accidental loss of personal information.

Personal information stored in electronic form is on password protected Company IT hardware and appropriate cloud storage and paper copies are kept in separate lockable filing cabinets.

The Company protects all servers and computers containing electronic personal data through the use of approved security software and firewalls and carries out a sequence of regular back-ups and system updates.

If personal information requires processing by an external service, such as a recruitment agency, they will be asked to demonstrate their compliance with the Company's security requirements, to ensure the careful handling and protection of personal information outside the Company. All subcontracted processors take instruction from the Company with regard to what information they process and what they can do with it.

If the Company needs to disclose personal information to other authorities to meet legitimate and legal obligations, it will ensure only relevant and accurate information is sent using secure channels.

The Company will carry out privacy breach risk assessments on a regular basis and use its findings to improve and strengthen the Company's processes and systems.



# **Automated Decision Making**

No decision will be made about you solely on the basis of automated decision making (ie where a decision is taken about you using an electronic system without human involvement).

### Safe Deletion or Destruction of Personal Information

The Company ensures that your personal information is only kept for reasonable periods of time to meet its legitimate business, contractual and legal obligations.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for up to one year once the recruitment exercise ends, to meet our legal obligations.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for up to two years once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

If your application is successful, your data will be kept and transferred to the systems we administer for staff. We have a separate privacy notice for staff, which will be provided to you.

# **Accessing Personal Information**

You have a legal right to make a request to the Company for disclosure of copies of personal information on you which is being processed by the Company: this is called a Subject Access Request. The Company seeks to process any such requests as quickly as possible, but within one month of the date of receipt. In some cases, the data will be exempt from the disclosure requirement, but if this applies, you will be informed. If you wish to make a Subject Access Request, you are required, in the first instance, to contact us and we will provide you with further details.





