



Job Applicant Privacy Notice

Information about data collected as
part of the recruitment process



As part of any recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

? What information does the Company collect?

The Company collects a range of information about you. This may include:

- Your name, address and contact details, including email address and telephone number
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration, including benefit entitlements
- Whether you have a disability for which the Company needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief

The Company collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests and personality questionnaires.

The Company will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).





? Why does the Company process personal data?

The Company needs to process data to be able to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment commences.

The Company 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 the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of job applicants, employees or workers and has concluded that they are not.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. It also requests further additional information regarding health after a conditional offer of employment has been made. This is to carry out its obligations and exercise specific rights in relation to employment. Your consent will be requested to process this information.

Where the Company processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes as permitted by the Data Protection Act 2018.

The Company seeks information about criminal convictions and offences. It does so because it is necessary for it to comply with a regulatory requirement to establish whether an individual has committed an unlawful act or been involved in dishonesty or other improper conduct. Such information will not be obtained until a conditional offer of employment has been made and you have given your written consent.

A summary of the data collected and the reason for processing it is outlined in the Appendix to this policy.

? Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

The Company will not transfer your data outside the UK.



? How does the Company protect data?

The Company takes the security of your data seriously. It has 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.

? For how long does the Company keep data?

If your application for employment is unsuccessful, the Company will hold all your data on file for 12 months after the end of the relevant recruitment process. If you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

The Company will continue to keep a basic record of your application and final status, for which you will not be identified as a data subject. Such information will be used for administrative and reporting purposes. It will be retained for as long as the Company considers it necessary to retain such information.

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

? Your rights

As a job applicant you are considered to be a data subject, and as such have a number of rights. You can:

- Access and obtain a copy of your data on request
- Require the Company to change incorrect or incomplete data
- Require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing
- Ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the Company's legitimate grounds for processing data

If you would like to exercise any of these rights, please contact the HR Manager.

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.



? What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

? Automated decision-making

Recruitment processes are not based solely on automated decision-making.





+ Appendix 1

Summary of Data Collected During the Recruitment Process

Category of Personal Data	Purpose of Processing	Legal Basis for Processing
Basic personal information and contact details (including name, address, date of birth, gender, telephone number, email address)	To allow the Company to maintain accurate records and contact details	Necessary to enter a contract
	For HR and business administration purposes	Necessary for the legitimate interests of the organisation
	For defence against potential legal claims	
Recruitment records including CVs, application forms, interview notes, test results, feedback from psychometric profiling, evidence of skills and qualifications, and references	To assess an individual's suitability for work and to determine to whom to offer employment	Necessary to enter a contract
	To comply with legislative and regulatory requirements	Necessary for compliance with a legal obligation
	For HR and business administration purposes	Necessary for the legitimate interests of the organisation
	For defence against potential legal claims	
Recruitment records containing special categories of personal data including: <ul style="list-style-type: none"> including details of any disabilities or reasonable adjustments disclosed as part of the recruitment process or information included on the Pre-Employment Health Declaration issued at offer stage proof of right to work in UK (such as passports and visas) information collected for purposes of equal opportunities monitoring criminal records data (including results of criminal record checks) 	To assess an individual's suitability for work and to determine to whom to offer employment	Necessary for the legitimate interests of the organisation
	To comply with the requirement to make reasonable adjustments	Necessary for compliance with a legal obligation
	For HR and business administration purposes	
	For defence against potential legal claims	

