

Privacy Notice for UK & EU Job Applicants

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as prospective employees of our Company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data that we obtain and hold must be processed according to the following set of core principles:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased as soon as is practicable
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data on our prospective employees in order to carry out effective and efficient processes. We keep this data in recruitment files both electronic and hard copy.

Specifically, depending on the stage of the recruitment process and the role, we may hold the following types of data:

- a) personal details such as name, address, phone numbers;
- b) name and contact details of your next of kin;
- c) photo ID;
- d) right to work documentation;
- e) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter;
- f) references from former employers;
- g) details on your education and employment history etc;

- h) criminal convictions/ Basic Disclosure records;
- i) passport information.

We will not ask you for the following information as part of the recruitment process, but if you supply it to us incidentally, we will hold it and process it with appropriate protections. We will not use this information to inform recruitment decisions.

- Protected characteristics under the Equality Act 2010 or any equivalent legislation that may apply or supersede it at the time of the recruitment process.
- For example, gender or marital status.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the recruitment exercise.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Should you be successful in your job application, we will gather further information from you, for example, your bank details and next of kin details, once your employment begins.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

| Activity requiring your data | Lawful basis |
|---|--------------------------|
| Carrying out checks in relation to your right to work in the UK | Legal obligation |
| Making reasonable adjustments for disabled employees | Legal obligation |
| Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion | Our legitimate interests |
| Making decisions about salary and other benefits | Our legitimate interests |
| Making decisions about contractual benefits to provide to you | Our legitimate interests |
| Assessing training needs | Our legitimate interests |
| Dealing with legal claims made against us | Our legitimate interests |
| Preventing fraud | Our legitimate interests |

E) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

F) CRIMINAL CONVICTION DATA

We follow the UK government's HMG Baseline Personnel Security Standard and we will collect criminal conviction data as part of this process. This data will be collected at the recruitment stage, but may also be collected during your employment. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of our legitimate interests to process this data.

G) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment will have access to your data which is relevant to their function. All employees with such responsibility must comply with our information security policy.

H) PROTECTING YOUR DATA

We have processes to ensure your data is protected against accidental loss or disclosure, destruction and abuse.

I) RETENTION PERIODS

Our default policy is to keep data for no longer than six months but a minimum of three after the close of the recruitment process. From time to time we may seek your consent to keep your data for longer, up to a maximum of three years.

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.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and you will be removed from the recruitment process.

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

J) AUTOMATED DECISION MAKING

Automated decision-making means making decisions about you using no human involvement e.g. using computerised filtering equipment. No decision which has a significant impact on you will be made about you solely on the basis of automated decision making.

K) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;

- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. However, in some cases, we may continue to hold the data to the extent we are required to by law.

L) QUERIES AND COMPLAINTS

- For any general queries about recruitment or this privacy notice please contact us at services@delib.net.
- We have appointed a Data Protection Officer (DPO) who can be contacted at dpo@delib.net
- If you think your data rights have been breached, please contact our DPO. However, if you feel that this is not possible, you can raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.