

# PRIVACY NOTICE – JOB APPLICANTS

Data controller: The Chesterford Group Limited

The organisation collects and processes personal data relating to its job applicants and prospective employees as part of the recruitment and on-boarding process. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

## **What information does the organisation collect?**

The organisation collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- the terms and conditions of your prospective employment;
- details of your qualifications, skills, experience, education history and employment history, including start and end dates, with previous employers, academic institutions and with the organisation;
- information about your current or prospective remuneration, including entitlement to benefits such as pensions or insurance cover;
- information about your nationality and entitlement to work in the UK;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The organisation may collect this information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the organisation may collect publicly available information about you from third parties, such as LinkedIn, Facebook and Twitter, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

All data will be stored in our GDPR compliant ATS (applicant tracking system) – Harri.

## **Why does the organisation process personal data?**

The organisation needs to use your data to process your application and determine your suitability for the role. The organisation also needs to ensure that it complies with its legal obligations regarding checking your entitlement to work in the UK.

In most cases, the organisation will use your personal data to comply with its legal obligations, to take steps towards entering into a contract with you, or to further the organisation's legitimate business interests.

This situations in which we will commonly use your personal data include where we will:

- assess your skills, qualifications and suitability for the role;
- carry out our vetting processes;
- communicate with you about the recruitment process;
- make informed and fair recruitment decisions;
- maintain appropriate records of our recruitment processes;
- ensure effective general HR and business administration;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to individuals with disabilities).

Where the organisation processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that the organisation uses for these purposes is anonymised or is collected with the express consent of individuals, which can be withdrawn at any time.

You are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

#### **Who has access to data?**

Your information may be shared internally, including with members of the HR and recruitment team (including payroll), your prospective line manager, prospective managers in the business area in which you work and IT staff, if access to the data is necessary for performance of their roles.

The organisation shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. In those circumstances the data will be subject to confidentiality arrangements.

The organisation will not transfer your data to countries outside the European Economic Area.

#### **How does the organisation protect data?**

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Access to personnel data is restricted by access controls and encryption.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

#### **For how long does the organisation keep data?**

The organisation will keep the personal data that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

### **Your rights**

As an individual, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation 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 organisation is relying on its legitimate interests as the legal ground for processing;
- request the restriction of processing your data, for example where you wish to suspend processing in order to establish accuracy of the information; and
- request transfer of data to another party in some circumstances.

If you would like to exercise any of these rights, please contact [HR@tcg-ltd.co.uk](mailto:HR@tcg-ltd.co.uk)

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