

PRIVACY NOTICE FOR CANDIDATES

As part of any recruitment process, Scrutton Bland collects and processes personal data relating to candidates. We are committed to being transparent about how and why we collect the data and to meeting our obligations under the General Data Protection Regulation (GDPR) that came into force on 25 May 2018.

Purpose of this Notice

Scrutton Bland is a Data Controller in respect of the personal data we collect and hold about you as part of the recruitment process. As a data controller, we are responsible for deciding:

- What data we collect;
- how we use it;
- how we store it;
- when we delete it.

Under the GDPR we are required to notify you of what we collect and when we delete it.

Types of Information Collected

Personal data means any information about an individual which can identify them. Personal data does not include anonymous data, the categories we may collect and hold about you may include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Personal details such as date of birth, gender and nationality;
- CV's or cover letters or any other supplementary document included as part of the application process where requested or not;
- Information about your right to work in the UK;
- Information regarding your work history, qualifications, professional memberships, education, experience, or employment references;
- Any information provided by you during the interview;
- The results of any assessments including online tests that we may carry out as part of the recruitment process.

We may also collect, store and use the following special categories of more sensitive personal data, which could include:

- Information about whether or not you have a disability for which we need to make reasonable adjustments as part of the recruitment process.
- Information about criminal convictions and offences (where the nature of the job requires this).

How is Data Collected

We may collect this information in a variety of ways, for example, data may be contained in applications forms, your CV, correspondence with you and through interviews or other assessments. We may also collect personal data about you from third parties, such as references supplied by former employers or agencies or through social media or professional sites such as LinkedIn etc where the information is in the public domain.

How is Data Stored

Your personal data will be stored in a range of different places, including our recruitment files, in our HR system and in other IT Systems (including email).

Why is your personal data processed?

Under the GDPR, a data controller should only collect your personal data if it has a valid purpose for doing so that falls into one of the prescribed categories set out in the GDPR. The purposes for which we process your data are set out below.

- We require personal data about you in order to take steps to enter into a contract with you and will retain that personal data in order to perform that contract.
- We have 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 organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.
- In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful candidate's eligibility to work in the UK before employment starts.
- We process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.
- For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment to establish whether or not an individual has committed an unlawful act or been involved in dishonesty or other improper conduct.
- Where it is necessary to collect and process any special categories of sensitive personal data, we will ensure it is handled with the utmost discretion and will limit access to the information to the individuals who require it for the purposes of which it is being requested / processed.

If you have any questions as to why we hold any type of personal data about you, please contact the Data Protection Officer or a member of the HR Team.

Who has access to your data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR Department, relevant hiring managers and interviewers involved in the recruitment process.

Your data will not be transferred outside the European Economic Area.

How is my information protected?

We take the security of your data very seriously. We have 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.

Data Retention?

We will not hold your personal data longer than we need it. If your application is unsuccessful, we will hold your data on file for six months after notification to you. If you are successful in your application, information collected as part of the recruitment process will be transferred to your personnel file and retained during your employment.

Your Rights

You also have the following rights when it comes to our handling of your data:

- Right of access – you have the right to request a copy of the personal data we have on you and to request supporting information explaining how the personal data is used
- Right of rectification – you have the right to request that we rectify inaccurate personal data about you
- Right of erasure – you have the right to request that we erase all personal data about you (please note that we may be able to reject or restrict the request in some circumstances, depending on the information we hold and our lawful reason to keep it)
- Right to restrict processing – in some situations, you have the right to request that we do not use the personal data you have provided (e.g. if you believe it to be inaccurate)
- Right to object – you have the right to object to certain processing of your personal data (unless we have overriding compelling grounds to continue processing)
- Right to data portability – where we are relying on your consent to use your information, you have the right to require us to provide you with a copy of your information for your use or transfer to another service provider.

If you would like to exercise any of these rights, please contact Scrutton Bland's Data Protection Officer at Fitzroy House, Crown Street, Ipswich, 1P1 3LG. We will respond to your request as soon as we can, however, no later than one month within receipt of your request.

If you believe that the data controller has not complied with your data protection rights, you can complain to the Information Commissioner. Contact details for the ICO can be found at <https://ico.org.uk/>

Your Responsibilities

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we 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.

Changes to this Notice

We may change this Privacy Notice from time to time, this may be necessary if for example the law changes or if we change our business in any way that affects personal data protection.