

GetBusy Privacy Notice for Applicants

What is the purpose of this document?

This privacy notice outlines how we, GetBusy Plc and GetBusy UK Limited (referred to in the privacy policy as “GetBusy”, “we” or “us”), collect, store and use personal information about you during and after your working relationship with us. GetBusy UK Limited and GetBusy Plc form part of the GetBusy group which includes GetBusy Australia Pty Limited and GetBusy USA Corporation. Please let us know if you would like more information about our group structure.

GetBusy is committed to safeguarding your personal information. Whenever you provide personal information to us, we are legally obliged to use it in accordance with data protection laws.

This privacy notice applies to candidates applying for a role with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used by us, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

It is important that you read this notice, together with any other privacy policy or notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that individual can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, store, and use the following categories of personal information about you: Identity details including name, title, date of birth, gender and other identification such as passport details and driving licence details.

- Identity details including name, title, date of birth, gender and other identification such as passport details and driving licence details.
- Contact details such as your address, telephone numbers, and personal email addresses.
- Application information including copies of right to work documentation, references and other information included in your CV or covering letter or otherwise as part of the application and recruitment process such as information collected during interviews that we ask you to attend and any relevant test results).

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race, ethnicity or nationality, religious beliefs and/or sexual orientation (this information will only be collected during the appointment process).

- Information about your health, including any medical condition or disability and health and sickness records.
- Information on any cautions and convictions for specified serious violent and sexual offences and any convictions resulting in a custodial sentence as well as any convictions where more than one conviction has been recorded.

We will not discriminate unfairly against you on the basis of a conviction or other information revealed about you on a criminal record check.

How is your personal information collected?

We collect personal information about employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes, where relevant, from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We do not envisage that any decisions will be taken about you using solely automated means, however we will notify you in writing if this position changes.

How we will use information about you

Where we are a data controller in respect of your personal information, we are required by relevant data protection laws to be clear about the purposes for which we are processing that personal information and our lawful basis for doing so. We set out below, in a table format, a description of the ways we plan to use your personal information in our capacity as a data controller.

Note that we may process your personal information using more than one lawful basis depending on the specific purpose for which we are using your information. Please contact us if you would like details about the specific legal basis we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing	Processing “special categories” of personal data
To provide you with information about your employment or engagement.	Necessary to perform our contract with you and/or to perform our legal obligations.	
Checking you are legally entitled to work in the country.	Necessary for GetBusy to comply with our legal obligations.	
Ascertaining your fitness to work.	Necessary for GetBusy to comply with our legal obligations.	May involve processing information about your physical or mental health or disability status - necessity for us to carry out our obligations and/or for

		you to exercise your rights in the field of employment and social security.
Complying with health and safety obligations and making appropriate workplace adjustments	Necessary for GetBusy to comply with our legal obligations.	May involve processing information about your physical or mental health or disability status - necessity for us to carry out our obligations and/or for you to exercise your rights in the field of employment and social security.
Equal opportunity monitoring	Necessary for GetBusy to comply with our legal obligations.	May involve processing information about your physical or mental health or disability status, race or ethnic origin, religious beliefs, or your sexual life or sexual orientation - necessity for us to carry out our obligations or for you to exercise your rights in the field of employment and social security and/or for reasons in the public interest on the basis of relevant laws (for the purposes of promoting equality of treatment).

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees, workers and contractors).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another lawful basis for doing so.

We ensure that access to your personal information is subject to restrictions on use and confidentiality commitments. Your personal information will be treated as confidential and will only be accessible by and/or disclosed to:

- staff within the GetBusy group that are responsible for processing your application or that are otherwise involved in the recruitment process (for example, our HR staff and relevant members of the management team such your line manager); and
- our service providers including third parties that supply services to us in connection with our recruitment processes and our IT suppliers such as hosting providers.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

International Transfers

We will, where relevant, transfer your personal information outside of the European Economic Area (EEA).

Where we transfer your personal data to corporate entities within the GetBusy group that are based outside of the EEA, we use specific contracts approved by the European Commission which ensure that your personal information is given the same protection it has in Europe. For further details and a copy of the relevant contracts, see the European Commission's webpage on the model contracts for the transfer of personal data to third countries.

Where we transfer your personal data to our US based service providers, we ensure that they are either certified under the EU-US privacy shield framework as having adequate safeguards in place or have in place specific contracts approved by the European Commission which ensure that your personal information is given the same protection it has in Europe. For further details on the privacy shield framework, you can go to the privacy shield website at <https://www.privacyshield.gov/Program-Overview>.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third-party service providers who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained by emailing us at privacy@getbusy.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

GetBusy will adhere to the retention schedules information relating to employees as defined in the [GetBusy Information Retention Policy](#) (where applicable to the information we hold about you).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will retain your personal information for a period of around 12 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

That said, in some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we will be permitted to use such anonymised information without further notice to you.

Your data protection rights and duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your application.

In certain circumstances, you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party (known as the “right to data portability”).
- **Right to withdraw consent.** In any circumstances where we have relied on your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, request that we transfer a copy of your personal information to another party, or withdraw your consent (in each case, where applicable) please contact us.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data Protection Authority

You also have the right to make a complaint at any time to a relevant supervisory authority for data protection issues:

- In the UK this is the Information Commissioner's Office (ICO) whose details can be accessed via the ICO website at <https://ico.org.uk/global/contact-us/>.
- In Australia this is the Office of the Australian Information Commissioner whose details can be accessed at the OAIC website at <https://www.oaic.gov.au/>.

Please note that there is no single national authority relevant for the USA. Should you have a complaint about data protection issues in the USA please email Privacy@getbusy.com and we will direct you to the appropriate relevant authority.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please let us know by contacting us at privacy@getbusy.com.

Contacting us

Our details are as follows:

GetBusy Privacy Team

privacy@getbusy.com

Last Updated 2nd April 2019