



# Recruitment Privacy Policy

Version 1.2 / August 2020



Trainline is committed to protecting the privacy and security of your personal information.

This Privacy Policy describes how we collect and use personal information about you during the recruitment process (whether it is directly applying for a job on Trainline website, or through a recruitment agency or online job portal).

Your personal information is collected and processed by the core Trainline group of companies:

- Trainline.com Limited
- Trainline SAS

We will refer to the two companies together as “we”, “us” or “Trainline” to be clear as joint Data Controllers. It also covers how you can exercise your rights.

## **The types of personal information we may collect and hold about you.**

Personal data means any information about an individual from which that person can be identified, directly or indirectly. The categories of personal data we may collect and hold about you include:

- Name, title, address, telephone number, and personal email address.
- Date of birth, gender, and nationality.
- CV's, cover letters or any other supplementary document included as part of the application process.
- Information about your right to work.
- Information regarding your work history, including qualifications, education, experience, or employment references.

## **We may also collect, store, and use the following special categories of sensitive personal data.**

Trainline may also collect, store, and use the following "special categories" of sensitive Personal Data (sometimes known as 'Special Category Data'), this could include:

**Disability info:** Processing is conducted based on consent.

- We need this info in order to make reasonable adjustments as part of the recruitment process, and to comply with the relevant Equality and Health and Safety Laws. It is voluntary info that you do not have to give if you would rather not.

**Criminal convictions & offences info:** Processing is necessary for the performance of employment contract.

- If you are applying for a job in our London, Edinburgh, or Paris office (where the nature of the job requires this), we will need info about your criminal convictions and offences to check your criminal record.

**Financial background checks info:** Processing is necessary for the performance of employment contract.

- For roles in our London and Edinburgh office (where applicable and necessary) we will conduct a financial background check. This may involve details relating to active criminal offences and information about your credit score.
- We work with third-party service providers (listed below) to check this info, and they process your data as Data Controllers in line with their own privacy policies.

## **Experian**

This info is processed, where necessary, to help us decide if you are suitable for employment as part of our obligations as an employer. We only work with trusted third parties who carry out these checks, only when it is necessary and relevant to your role. If you are not happy to give us this info, we may not be able to proceed with your offer of employment. Find out more about how [Experian](#) process your data.

## **Information you give us directly**

You give us your personal data, for different reasons at different stages of the application process. To make things simple, we have split the key processing areas into sections below.

### **Application and Provisional offer stage**

We process personal data that relates to you so that we can –

- Confirm your identity and your right to work.
- Understand your work history.
- Make sure you have the necessary skills to successfully perform the role we have advertised.

We need the above info to be able to enter into a contract for employment.

## **Information provided indirectly**

If we have given you a provisional offer, we will need to check your references to validate your last three years of employment. This means, you will need to provide us the contact details for referees so we can confirm your work history and skill set.

It is in our legitimate interest to verify your experience. If you choose not to give us the contact details for any references, we will not be able to continue with your application.

We may also use publicly available website like LinkedIn to identify and contact potential candidates for future roles and to also to post job positions.

## Keeping your data

If you are a successful candidate, your personal info will be held in your employee file, in line with the Privacy Policy set out in our Staff Handbook which will be provided to you once you receive an offer of employment.

If you are an unsuccessful candidate, we may still hold your info in our talent pool in case of any future vacancy or to add into any further applications you may make for new positions with us. This info is held in line with our legitimate interest.

## How long do we retain your data?

We will hold your data for a maximum of two years from the date your application was submitted.

If you do not want us to keep your data on file, you can ask for your data to be deleted. Please contact us at [privacyquery@thetrainline.com](mailto:privacyquery@thetrainline.com) to request for your data to be deleted.

We may retain pseudonymous data and where possible, anonymised statistical information to help inform our recruitment activities.

## Sharing of your information

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of Trainline People Team (HR), recruitment agencies, relevant hiring managers and interviewers involved in the recruitment process.

We may share your info within the Trainline Group of Companies and with third-party service providers, for the purpose of collecting, processing, and validating your info to support your application. These third parties will only have access to the relevant details they need and will not use your info for any other reason. Of course, they will also be required to follow data protection laws, including taking adequate steps to secure and protect your personal info. If any of these third-party service providers are based outside the EEA (European Economic Area), we will make sure that suitable safeguards are in place.

## Security

We take the security of your data very seriously. We have comprehensive internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed. These controls also ensure your data is not accessed, except by Trainline employees or trusted third parties, in the performance of their duties.

All third parties engaged to process personal data on our behalf, do so on the basis of strict written instructions and are contractually bound to maintain appropriate technical and organisational measures to protect your data. We have put in place robust 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.

## Your Rights

You 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 hold. [Find out more](#)



### Right of rectification

You have the right to request that we rectify inaccurate personal data about you. [Find out more](#)



### 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). [Find out more](#)



### 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). [Find out more](#)



## 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). [Find out more](#)



## Right to data portability

This applies to information you give us. You can ask us to transfer this information to another data controller in an easy-to-read manner. [Find out more](#)

Please note, we may require proof of ID before we can deal with your request.

## How to contact us

If you would like to contact us about this recruitment process, please email our People Team (HR) at [people@thetrainline.com](mailto:people@thetrainline.com).

If you would like to exercise your rights under GDPR, please contact [privacyquery@thetrainline.com](mailto:privacyquery@thetrainline.com) or write to us at Data Protection Officer: 120 Holborn, London EC1N 2TD

## How to contact the regulator

If you believe that the data controller has not complied with your data protection rights, you can complain to the [Information Commissioner Office](#) (ICO).

If you are applying for a job in our Paris office, your data will be looked after by Trainline S.A.S and any complaints need to go to [Commission Nationale de L'informatique et des Libertés](#) (CNIL).