

## Applicant Data Protection Privacy Notice

Version: Head of HR V2 February 2020

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Data Controller: One Health Group Limited, 131 Psalter Lane, Sheffield, S11 8UX

Our Data Protection Register number is Z9057663 and our entry can be found on the Information Commissioner's website: <https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

The Company is able to provide additional information regarding this Privacy Notice or explanations where needed.

### What information does the Company collect?

As part of our recruitment process, the Company collects and processes personal data i.e. data that identifies or relates to an individual. In terms of the recruitment process this data relates to job applicants. The Company is committed to being open and transparent about how it collects and uses that data and to meeting its data protection obligations.

The Company collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The Company collects this information in a variety of ways. For example, data is contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

The Company also collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR spreadsheets and on other IT systems (including email).

### Why does the Company process personal data?

The Company needs to process data to take steps; at your request, prior to entering into a contract with you. If you are successful as part of the recruitment process, the Company will also need to process your data to enter into a contract with you i.e. as an employee. In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has 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 Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of job applicants, employees or workers and has concluded that they are not.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the organisation processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes as permitted by the Data Protection Act 2018.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company 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/comply with a regulatory requirement to establish whether or not an individual has committed an unlawful act or been involved in dishonesty or other improper conduct.

The Company will not use your data for any purpose other than the recruitment exercise for which you have applied and any potential vacancies you may be suitable for within 6 months of application.

### Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes Chief Executive, SMT (Senior Management Team), members of the HR team, interviewers involved in the recruitment process, line managers in the business area for which you may be considered and IT if access to the data is necessary for the performance of their roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

The Company will not transfer your data outside the European Economic Area (EEA).

### How does the Company protect data?

The Company takes the security of your data seriously. It has internal policies and technical controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. All Company employees understand their responsibilities in relation to the protection of data and undertake data security and protection training as part of the recommended Statutory and Mandatory Training (SMT).

### For how long does the Company keep data?

If your application for employment is unsuccessful, the Company will hold your data on file for 1 year after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in an Employee Data Protection Privacy Notice. All application and employment data is held in line with statutory retention schedules. These are outlined as part of our Records Management Policy.

### Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company 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 Company is relying on its legitimate interests as the legal ground for processing;
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Head of HR. Please be aware, where a request to erase data is made, this may only be fulfilled if the data is not being retained in line with a statutory provision e.g. the Company has a legal obligation to hold data for a certain period of time. All requests relating to an individual's rights will be considered in line with the legal basis for processing the data, as this determines which rights can be applied. For further information, please contact the Head of HR or the Data Protection Officer. If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.

### What if you do not provide personal data?

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

## Automated decision-making

Recruitment processes are not based solely on automated decision-making.

### Policy Statement

We reserve the right to make changes to this policy as and when it becomes necessary to do so, either because of a change in legislation or where it becomes necessary in order to improve the efficiency of One Health Group or its working environment. This policy does not form part of an employee's contract of employment, however contravention of this policy may be treated as a disciplinary matter. The contents of this policy will be reviewed annually in accordance with the central register by the person responsible for drafting the policy.

**Updated:** 7 February 2020

**Reviewed:** 7 February 2020