

Recruitment Privacy Policy

1. Applying for a job

When you apply for a job with us, we collect and process a range of personal data in order to assess your suitability for employment. 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.

We ask for:

- personal details including name and contact details
- details of your qualifications, skills, experience and employment history
- information about your current level of remuneration, including benefit entitlements
- availability, including notice periods and other commitments

The legal basis we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

We will also ask whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process. The legal bases we rely on for this are article 6(1)(c) of the GDPR which allows us to process information to meet a legal obligation and article 9(2)(b) as the processing is necessary for the purposes of carrying out our obligations in the field of social security and social protection law.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts. In these situations the legal basis we rely on is article 6(1)(c) of the GDPR which allows us to process information to meet a legal obligation.

When we make a job offer we will also seek information from third parties, such as references supplied by former employers and information from employment background check providers. For some roles, we are legally obliged by safeguarding legislation to conduct criminal records checks. This usually applies to roles that involve working with minors. The legal basis we rely on is article 6(1)(c) of the GDPR which allows us to process information to meet a legal obligation.

2. If you fail to provide personal information

If you fail to provide information which is necessary for us to consider your application (such as evidence of qualifications or work history) when requested, we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

3. How we use particularly sensitive personal information

We will use your particularly sensitive personal information relating to your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

4. Sharing your information

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. Prior to making an offer the organisation may share your data with your 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, if appropriate and justified.

5. Keeping your information

If you are unsuccessful after assessment for the role, we will hold your data on file for 12 months after the end of the relevant recruitment process. At this point your data will be deleted. If we wish to retain your personal information on file, on the basis that a suitable opportunity may arise in the future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your electronic personnel file and our HR system to be retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

6. Right to withdraw consent.

You have the right to withdraw your consent to us processing your personal information for the purposes of the recruitment exercise at any time. To withdraw your consent, please contact our HR Manager (HR@manniondaniels.com). Once we have received notification that you have withdrawn consent, we will no longer process your application and we will dispose of your personal data securely.

7. Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information
- **Request correction** of the personal information that we hold about you,
- **Request erasure** of your personal information
- **Object to processing**
- **Request the restriction of processing** of your personal information
- **Request the transfer** of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR Manager in writing (HR@manniondaniels.com).

8. Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.