

GDPR Privacy Notice for Job Applicants	
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GDPR Privacy Notice for Job Applicants Sign Off	
This GDPR Privacy Notice for Job Applicants was Reviewed, Approved & Adopted as follows:	
Date Review Undertaken:	23rd July 2026
Review Undertaken By:	Julie Kinley Director of Business Services
Date of Adoption:	27th July 2026
Date of Next Review:	27th July 2027
Signed Off By:	Rashid Bhayat CEO

Definitions

In this GDPR Privacy Notice for Job Applicants, the following words and phrases have the following meanings:

- **Consent** | means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify their agreement to the processing of personal data relating to them.
- **Criminal Records Personal Data** | means personal data relating to criminal convictions and offences and personal data relating to criminal allegations and proceedings.
- **Data Protection Legislation** | means the UK **General Data Protection Regulation (GDPR)**, the **Data Protection Act 2018** and any other applicable primary or secondary legislation as may be in force in the UK from time to time.
- **Data Subject** | means a living identified or identifiable individual about whom the organisation holds personal data.
- **Job Applicant** | is any person that applies for any paid or non-paid role with the organisation, whether they apply for a role directly or indirectly through an employment agency.
- **Personal Data** | is any information relating to a data subject who can be identified (directly or indirectly) either from those data alone or by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that data subject. It excludes anonymised data **i.e.** where all identifying particulars have been removed.
- **Processing** | is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disclosing, disseminating, restricting, erasing or destroying. It also includes transmitting or transferring personal data to third parties.
- **Special Categories of Personal Data** | means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data, data concerning the physical or mental health of a data subject or data concerning a data subject's sex life or sexual orientation.

Introduction

As part of any recruitment process, the organisation collects and processes personal information, or personal data, relating to job applicants. This personal information may be held by the organisation on paper or in electronic format.

The organisation is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the UK **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**. The purpose of this Privacy Notice is to make you aware of how and why the organisation will collect and use your personal information during the recruitment process. The organisation are required under the UK **GDPR** to notify you of the information contained in this Privacy Notice.

This Privacy Notice applies to all job applicants, whether they apply for a role directly or indirectly through an employment agency. It is non-contractual.

Person with responsibility for data protection

The organisation has appointed a person with responsibility for our data protection compliance - and to oversee compliance with this Privacy Notice. You should contact the person with responsibility for data protection - named at the beginning of this document - if you have any questions about this Privacy Notice or about how the organisation handles your personal information.

The Data Protection Principles

Under the GDPR, there are six data protection principles that the organisation must comply with. These provide that the personal information the organisation hold about you must be:

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1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

The organisation is responsible for, and must be able to demonstrate compliance with, these data protection principles. This is called Accountability.

What types of personal information does the organisation collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data **i.e.** where all identifying particulars have been removed. There are also **special categories** of personal information, and personal information on criminal convictions and offences, which requires a higher level of protection because it is of a more sensitive nature. The special categories of personal information comprise information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

The organisation believes that you have a reasonable expectation, as someone that is seeking to be employed with us, that the organisation will process your personal information. The organisation have indicated - by placing a tick next to each type of personal information listed below - what lawful basis we are relying on to process that particular type of personal information.

The organisation collects, uses and processes a range of personal information about you during the recruitment process. This includes - as applicable to the role applied for - the following:	Lawful Bases for Processing		
	1	2	3
a. Your contact details, including your name, address, telephone number and personal e-mail address.	✓		✓
b. Personal information included in a CV, any application form, cover letter or interview notes.	✓		✓
c. References.	✓		✓
d. Information about your right to work in the UK and copies of proof of right to work documentation.	✓	✓	
e. Copies of qualification certificates.	✓		✓
f. Copy of driving licence.	✓	✓	✓
g. Other background check documentation.	✓		✓
h. Details of your skills, qualifications, experience and work history with previous employers.	✓		✓
i. Information about your current salary level, including benefits and pension entitlements.	✓		✓
j. Your professional memberships.	✓		✓

The organisation may also collect, use and process the following special categories of your personal information during the recruitment process (as applicable):	Lawful Bases for Processing		
	1	2	3
k. Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process	✓	✓	
l. Information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation	✓		
m. Information about criminal convictions and offences.	✓	✓	✓

How does the organisation collect your personal information?

The organisation collects personal information about you during the recruitment process either directly from you, or sometimes from a third party such as an employment agency. The organisation may also collect personal information from other external third parties, such as references from current and former employers, information from background check providers, information from credit reference agencies and criminal record checks from the **Disclosure and Barring Service (DBS)**. Other than employment agencies, the organisation will only seek personal information from third parties during the recruitment process once an offer of employment or engagement has been made to you and the organisation will inform you that they are doing so.

You are under no statutory or contractual obligation to provide personal information to the organisation during the recruitment process.

Your personal information may be stored in different places, including on your application record, in the organisation's HR management system and in other IT systems, such as the e-mail system.

Why and how does the organisation use your personal information?

The organisation will only use your personal information when the law allows us to do so. These are known as the **lawful bases for processing**. The organisation will use your personal information in one or more of the following circumstances:

- 1. Where the organisation need to do so to take steps at your request prior to entering into a contract with you, or to enter into a contract with you.**
- 2. Where the organisation needs to comply with a legal obligation.**
- 3. Where it is necessary for the organisation's legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override the organisation's interests.**

The organisation need all the types of personal information listed under **What types of personal information does the organisation collect about you?** primarily to enable the organisation to take steps at your request to enter into a contract with you, or to enter into a contract with you, and to enable the organisation to comply with its legal obligations. In some cases, the organisation may also use your personal information where it is necessary to pursue its legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override the organisation's interests.

The organisation's legitimate interests include:

- Pursuing our business by employing employees, workers, volunteers and contractors, as applicable
- Managing the recruitment process
- Conducting due diligence on prospective staff and performing effective internal administration.

The organisation believes that you have a reasonable expectation, as someone that is seeking to be employed with us, that the organisation will process your personal information.

The purposes for which the organisation are processing, or will process, your personal information are to:

- Manage the recruitment process and assess your suitability for employment or engagement
- Decide to whom to offer a job

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- Comply with statutory and/or regulatory requirements and obligations **e.g.** checking your right to work in the UK
- Comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations
- Ensure compliance with your statutory rights
- Ensure effective HR, personnel management and business administration
- Monitor equal opportunities
- Enable the organisation to establish, exercise or defend possible legal claims.

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

What if you fail to provide personal information?

If you fail to provide certain personal information when requested, the organisation may not be able to process your job application properly or at all, the organisation may not be able to enter into a contract with you, or the organisation may be prevented from complying with its legal obligations. You may also be unable to exercise your statutory rights.

Why and how does the organisation use your sensitive personal information?

The organisation will only collect and use your sensitive personal information - which includes special categories of personal information and information about criminal convictions and offences - when the law allows the organisation to do so.

Some special categories of personal information **i.e.** information about your health and information about any criminal convictions and offences, is also processed so that the organisation can perform or exercise its obligations or rights under employment law and in line with our **Data Protection Policy**.

The organisation may also process information about your health and information about any criminal convictions and offences where we have your explicit written consent. In this case, the organisation will first provide you with full details of the personal information we would like and the reason why it is needed, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time.

The purposes for which the organisation are processing, or will process, health information and information about any criminal convictions and offences, are to:

- Assess your suitability for employment or engagement
- Comply with statutory and/or regulatory requirements and obligations **e.g.** carrying out criminal record checks
- Comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations
- Ensure compliance with your statutory rights
- Ascertain your fitness to work
- Ensure effective HR, personnel management and business administration
- Monitor equal opportunities.

Where the organisation processes other special categories of personal information **i.e.** information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation, this is done only for the purpose of equal opportunities monitoring in recruitment and in line with the organisation's **Data Protection Policy**. Personal information that the organisation uses for these purposes is either anonymised or is collected with your explicit written consent, which can be withdrawn at any time. It is entirely your choice whether to provide such personal information.

The organisation may also occasionally use your special categories of personal information, and information about any criminal convictions and offences, where it is needed for the establishment, exercise or defence of legal claims.

Change of purpose

The organisation will only use your personal information for the purposes for which it was collected it **i.e.** for the recruitment exercise for which you have applied.

However, if your job application is unsuccessful, the organisation may wish to keep your personal information on file for in case there are future suitable employment opportunities with the organisation. The organisation will ask

for your consent before your personal information is kept on file for this purpose. Your consent can be withdrawn at any time.

Who has access to your personal information?

Your personal information may be shared internally within the organisation for the purposes of the recruitment exercise, including with members of the HR department, members of the recruitment team, managers in the department which has the vacancy and IT staff if access to your personal information is necessary for the performance of their roles.

The organisation will not share your personal information with third parties during the recruitment process unless your job application is successful and the organisation make you an offer of employment or engagement. At that stage, the organisation may also share your personal information with third parties (and their designated agents), including:

- External organisations for the purposes of conducting pre-employment reference and employment background checks
- The **DBS**, to obtain a criminal record check
- Former employers, to obtain references
- Professional advisors, such as lawyers and HR consultants.

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

The organisation may share your personal information with third parties where it is necessary to take steps at your request to enter into a contract with you, or to enter into a contract with you, where the organisation need to comply with a legal obligation, or where it is necessary for the organisation's legitimate interests (or those of a third party).

How does the organisation protect your personal information?

The organisation has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, the organisation limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from the person with responsibility for data protection - named at the beginning of this document.

Where your personal information is shared with third parties, the organisation require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. The organisation only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The organisation also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

For how long does the organisation keep your personal information?

The organisation will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

If your application for employment or engagement is unsuccessful, the organisation will generally hold your personal information for six months after the end of the relevant recruitment exercise but this is subject to:

- a) Any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records.
- b) The retention of some types of personal information for up to **six years** to protect against legal risk **e.g.** if they could be relevant to a possible legal claim in a **Tribunal, County Court** or **High Court**.

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If you have consented to the organisation keeping your personal information on file for in case there are future suitable employment opportunities with the organisation, the organisation will hold your personal information for a further **12 months** after the end of the relevant recruitment exercise, or until you withdraw your consent if earlier.

If your application for employment or engagement is successful, personal information gathered during the recruitment process will be retained for the duration of your employment or engagement and in accordance with the **Privacy Notice for Staff**.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from the organisation's IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances the organisation may anonymise your personal information so that it no longer permits your identification. In this case, the organisation may retain such information for a longer period.

Your rights in connection with your personal information

As a data subject, you have a number of statutory rights. Subject to certain conditions - and in certain circumstances - you have the right to:

- **Request access to your personal information:** This is usually known as making a **Data Subject Access Request** and it enables you to receive a copy of the personal information the organisation hold about you and to check that we are lawfully processing it.
- **Request rectification of your personal information:** This enables you to have any inaccurate or incomplete personal information the organisation hold about you corrected.
- **Request the erasure of your personal information:** This enables you to ask the organisation to delete or remove your personal information where there's no compelling reason for its continued processing **e.g.** it's no longer necessary in relation to the purpose for which it was originally collected.
- **Restrict the processing of your personal information:** This enables you to ask the organisation to suspend the processing of your personal information **e.g.** if you contest its accuracy and so want the organisation to verify its accuracy.
- **Object to the processing of your personal information:** This enables you to ask the organisation to stop processing your personal information where we are relying on the legitimate interests of the business as the legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground.
- **Data portability:** This gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact the person with responsibility for data protection - named at the beginning of this document. The organisation may need to request specific information from you in order to verify your identity and check your right to access the personal information, or to exercise any of your other rights.

This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact the person with responsibility for data protection - named at the beginning of this document. Once the organisation have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless the organisation have another legal basis for processing.

If you believe that the organisation has not complied with your data protection rights, you have the right to make a complaint to the **Information Commissioner's Office (ICO)** at any time.

Transferring personal information to third countries

The organisation will not transfer your personal information to third countries or international organisations.

Automated decision making

Automated decision making occurs when an electronic system uses your personal information to make a decision without human intervention. The organisation do not envisage that any recruitment decisions will be taken about you based solely on automated decision making, including profiling.

Changes to this Privacy Notice

The organisation reserves the right to update or amend this Privacy Notice at any time. The organisation will issue you with a new Privacy Notice when we make significant updates or amendments. The organisation may also notify you about the processing of your personal information in other ways.

Contact

If you have any questions about this Privacy Notice or how the organisation handle your personal information, please contact the person with responsibility for data protection - named at the beginning of this document.