

# Job Applicant Privacy Notice – Effective from 25<sup>th</sup> May 2018



Data controller: Twycross Zoo East Midland Zoological Society Limited, Burton Road, Atherstone, Warwickshire, CV9 3PX

Data protection officer: Director of Finance – [dpo@twycrosszoo.org](mailto:dpo@twycrosszoo.org)

As part of any recruitment process, the organisation collects and processes personal data relating to job applicants. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

## What information does the organisation collect?

The organisation collects and processes 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, including start and end dates, with previous employers and with the organisation;
- information about your current level of remuneration, including benefit entitlements
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record; and
- equal opportunities monitoring information, including information about your ethnic origin and health.

The organisation collects this information in a variety of ways. For example, data might be 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 organisation will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

## Why does the organisation process personal data?

The organisation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job and keep records of the recruitment process.

In some cases, the organisation 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 organisation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. The organisation 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 employees or workers and has concluded that they are not.

The organisation 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.

For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation 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.

If your application is unsuccessful, the organisation will keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **Who has access to data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the Human Resources and recruitment teams, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff, should access to the data is necessary for performance of their roles. In addition your information may be shared with third parties that provide recruitment services to the organisation (for example where a third party provides services in assessing candidate suitability, pre-selection testing or arranging interviews). The organisation will 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. In the event that you are offered employment, an Employee Privacy Notice will be given to you.

The organisation (and any third parties that are engaged) will not transfer your data to countries outside the European Economic Area.

### **How does the organisation protect data?**

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties. All documentation which is held electronically has restricted access to ensure only those employees that should be able to access such information are able to do so. Access to electronic data is managed by the IT and HR departments to ensure that access rights are maintained. Access to paper-based data is managed by way of secure storage.

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.

### **For how long does the organisation keep data?**

If your application for employment is unsuccessful, the organisation will hold your data on file for a period of 6 months after the end of the relevant recruitment process. The organisation will seek your consent for your data to be kept for the purpose of consideration for future opportunities for which you may be suited. You will be asked for your consent before your data is kept for this purpose and you are free to withdraw your consent at any time.

If your application is successful, the organisation will hold your personal data for the duration of your employment. The period for which your data is held after the end of employment will be in most cases, 6 years. Further details are available from the HR Department.

### **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 organisation to change incorrect or incomplete data;
- require the organisation 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 organisation is relying on its legitimate interests as the legal ground for processing; and

- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact [human.resources@twycrosszoo.org](mailto:human.resources@twycrosszoo.org).

If you believe that the organisation 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 organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

**Automated decision-making**

Employment decisions are not based solely on automated decision-making.

In the event that you have any queries regarding the protection of your personal data, please refer to [human.resources@twycrosszoo.org](mailto:human.resources@twycrosszoo.org) in the first instance.