

# Recruitment Privacy Policy



Data Controller: Anglia Components Plc, Sandall Road, Wisbech, PE13 2PS ('the Company')

Person Responsible for Data Protection: Operations Director, email; [GDPR@anglia.com](mailto:GDPR@anglia.com)

As part of the Company's recruitment process, the Company will collect and process personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice is non-contractual and can be amended at any time.

## 1. What personal data does the Company collect?

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

- Your name, title, address, marital status, gender and contact details, including email address and telephone number (\* and \*\*);
- Date of birth (\* and \*\*);
- Details of your qualifications, skills, experience and employment/education history (\*\*);
- Application form, covering letter, interview notes, correspondence relating to the outcome of the recruitment process (either successful or unsuccessful) (\*\*);
- Information about your current salary, including benefit entitlements (\*\*); and
- CCTV footage captured when you visit the Company's premises (\*\*).

The Company may collect this information directly from you in a number of ways. For example, data may be contained in application forms, CV's or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The Company may also collect personal data about you from third parties, such as references supplied by former employers, employment agencies, information from employment background check providers and information from criminal record checks.

The Company will seek information from third parties only once a job offer to you has been made.

We may sometimes collect additional information from publicly available sources, such as social media sites, for example, LinkedIn.

The Company may also process the following 'special categories' of sensitive personal information:

- Information about your entitlement to work in the UK.
- Whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process.
- Information relating to ethnic origin, race, religious, philosophical or moral beliefs, or your sexual life or sexual orientation.
- Information on unspent criminal convictions.

## 2. Why does the Company process personal data?

The Company needs to process data prior to entering into a contract with you, which may be an invite to attend an interview. It may also need to process your data to enter into an employment contract with you (\*).

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. The Company believes that this is not incompatible with your rights and freedoms (\*\*\*) .

We have indicated by asterisks in section 1 above the purpose or purposes for which the Company processes your personal information. There may be several grounds which justify the Company's use of your personal information.

The Company may process 'special categories' of sensitive information in the following circumstances:

- Where it needs to carry out its legal obligations; and
- In limited circumstances, with your explicit written consent.

## 3. How is your personal data used?

The Company will use your personal information in the following ways (this list is not exhaustive):

- Making a decision about your recruitment or appointment;
- Managing the recruitment process; and
- Ensuring compliance with legal requirements.

The Company will use your 'special categories' of sensitive personal information in the following ways (this list is not exhaustive):

- It will use your passport and other right to work documentation to check that you are legally entitled to work for the Company.
- It will use information about your ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics and diversity within the workforce.
- It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. The Company processes such information to carry out its obligations and exercise specific rights in relation to employment.
- 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.

If you are successful in your job application, please see the Staff Privacy Notice (available from the Operations Director) for information on how your personal data is processed.

#### **4. Who has access to your data?**

Your information may be shared internally for the purpose of the recruitment exercise to those who need to know that information. This includes members of the recruitment team and interviewers involved in the recruitment process. If your application is successful, your information will also be shared with the HR Department and your name will also be shared with the Manager of the department with the vacancy and IT staff for them to set up any IT equipment and user id's for you to be able to perform your job role. As an introduction just prior to joining Anglia your name and job role and where you have come from will be announced in the Company Information Sheet.

The Company will not share your data with any 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 any necessary criminal records checks.

During the application process, the Company will not transfer your data outside the European Economic Area.

#### **5. How does the Company protect your personal data?**

The Company takes the security of your personal data very seriously. It has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties. Personal data stored on the Company's systems is secured by Windows Security to ensure only authorised users can access and use data. This data is backed up each day as a loss prevention defence.

Where the Company engages third parties to process personal data on its behalf, and do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and Company measures to ensure the security of data.

#### **6. For how long does the Company keep your personal data?**

If your application for employment is unsuccessful, the Company will hold your data on file for 12 months after the end of the relevant recruitment process. If you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further 6 years for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, 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 the Staff Privacy Notice.

#### **7. Your rights**

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

- Access and obtain a copy of your personal data on request;
- Require the Company to change incorrect or incomplete personal data;

- Require the Company to delete or stop processing your personal data, for example where the data is no longer necessary for the purposes of processing; and
- Object to or restrict the processing of your personal data where the Company is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Jill Bowie at [GDPR@anglia.com](mailto:GDPR@anglia.com). Some of these rights are not automatic, and the Company reserves the right to discuss with you why it might not comply with a request.

#### **8. What if you do not provide personal data?**

Where provision of your personal data is required for the Company to enter into an employment contract with you or is a statutory requirement (i.e. right to work), refusal to provide this information will prevent the Company from being able to offer you employment.

#### **9. Automated decision-making**

Recruitment processes are not based solely on automated decision making.

#### **10. Who should you contact if you have queries about the Company's use of your personal data?**

If you have any concerns or queries about the Company's use of your personal data, please contact Jill Bowie at [GDPR@anglia.com](mailto:GDPR@anglia.com).

You retain the right to lodge a complaint about the Company's management of your personal data with the Information Commissioner's Office.