

## **GDPR - Privacy Notice for job applicants**

### **Job Applicant Privacy Notice**

1. As part of our candidate application and recruitment process Claritas Solutions Ltd (“the Company” or “we”, “us”, “our”) collects, processes and stores personal data about you. Personal data is any data or information from which an individual can be identified or data which when mixed with other information held about the same individual would make it obvious as to who the subject of the data is. Examples of personal data include name, address, telephone number, age, qualifications and employment history.

We may also process special category data about you. Special category data includes, for example, information about an individual’s race, ethnic origin, politics, religion, biometrics (where used for identification purposes) and Health/Medical history. We will only process this where it is necessary and any processing will be done in accordance with our obligations under relevant data protection legislation.

We are committed to being transparent about how we collect and use your data and to meeting our data protection obligations. This Privacy Notice sets out:

- why we process your personal data;
- what data is processed; and
- how it is processed as part of the recruitment process.

Throughout this Privacy Notice we use the term “processing” to cover all activities involving your personal data, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of your data.

### **Why we process your personal data**

2. In order to manage your application we need to process certain personal data about you. We will process your data for the purposes of progressing your application and as required by law or regulatory requirements, so not all of the lawful purposes for which we process your personal data will apply to you all of the time. Processing will always be fair and lawful and in accordance with applicable data protection legislation.

3. We may need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into (and comply with our obligations under) an employment contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations; for example, it is mandatory to check a successful applicant’s eligibility to work in the UK before employment starts or in relation to employment, social security and/or social protection.

We also have a legitimate interest in processing your personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the

recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

We may also need to process data from job applicants to respond to and defend legal claims.

4. We may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics and to comply with legal obligations in relation to equality and diversity.

We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is in accordance with legal obligations in relation to equality but also to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting if successful and to complete pre-employment checks.

### **What personal data we might process**

5. Claritas Solutions Ltd may process a range of information about you. This includes the following examples:

- personal details such as name, address (including proof of address), date and place of birth, telephone number(s), bank account details for salary payment purposes (if successful);
- work history/job data: previous employers, positions, dates; remuneration: basic salary, benefit entitlements, bonuses; education and work history including professional qualifications, skills and/or memberships;
- references to include regulated references where necessary (this could include absence information received from referees);
- nationality/visa/right to work information (e.g. passport/driving licence/national insurance numbers/birth certificate/evidence of name or gender change);
- images from on-site CCTV,
- results of pre-employment screening checks (e.g. credit history and criminal records checks where permitted by law);
- notes from interviews and/or assessment results e.g. psychometric test or written assessment results.

6. During the process we may also capture some special category data about you (e.g. disability information, change of gender information).

### **Who we share your personal data with**

7. We will need to share your personal data internally and may require to share it with some external parties (e.g. Recruitment Agency partners) or associates of the Company. Your information will only be shared if it is necessary or required and permitted by law (for example in order to carry out pre-employment screening).

8. The recruitment process will involve:

- assessing and progressing your application, assessing your suitability (skills, strengths, behaviours for the role); and/or
  - activities needed to complete the on-boarding and screening process should your application be successful.
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9. To enable these processes your personal data may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your personal data may be shared internally with the following people:

- manager with responsibility for you or are acting on their behalf;
- HR with responsibility for HR processes such as recruitment, assessment, pre-employment screening (for example checking whether applicants have a student loan and/or arrears);
- Finance;
- IT and system owners who manage user access.

We may also need to share your data with certain external third parties including:

- companies who provide candidate interview and assessment services to us,
- partners who undertake Police Checks and Security Clearance on behalf of the Company
- academic institutions (Universities, colleges, etc.) in validating information you've provided
- other third-party suppliers (or potential suppliers) who provide services on our behalf.

## **How we protect your information**

10. Our systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur. This is done in accordance with our Information Security Policy.

11. We also requires third party suppliers or recipients of personal data to guarantee an equivalent level of protection as provided by us.

## **How long Claritas keeps data**

12. Your personal data will be retained in accordance with the Company's Information Security Policy. If your application for employment is unsuccessful, Claritas will hold your data on file for a short period of time until the position has been filled and the recruitment process is complete. All data gathered during the recruitment process (CV's, Application forms, copies of ID Documentation, Interview Assessments and supporting interview notes etc.) will be deleted and/or destroyed. You may be asked when you submit your CV whether you give us consent to hold your details in order to be considered for other positions.

13. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained in accordance with our Data Protection and Security policy.

## **Your Rights**

14. Subject to certain conditions, you have the following rights in relation to the personal data we hold about you:

- the right to be informed about the collection and use of your personal data;
  - the right to access the personal data that Claritas holds about you (subject access request);
  - the right to request changes to be made to incorrect data (rectification);
  - the right to request deletion of your personal data (deletion);
  - the right to request transfer of your personal data (data portability);
  - the right to ask for use of your personal data to be restricted (restriction);
  - the right to object to the processing of your personal data (objection).
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15. If you have any queries about this Privacy Notice or your personal data generally, you should contact our HR Manager in the first instance. [Pat.Genn@claritas-solutions.com](mailto:Pat.Genn@claritas-solutions.com)

16. It is your responsibility to keep your personal data up to date so that accurate application records can be maintained. If you need to make any changes to your personal data once you have started the recruitment process you should contact HR.

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

17. You are under no statutory or contractual obligation to provide personal data to Claritas during the recruitment process, however, if you do not provide all of the information we require, we may not be able to progress you through our process.

### **Contact**

18. If you would like to discuss anything in this privacy notice, please contact: Human Resources or the Company's Data Protection Officer on [ClaritasGDPR@claritas-solutions.com](mailto:ClaritasGDPR@claritas-solutions.com)

19. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

20. Claritas Solutions Ltd is the controller of data for the purposes of the DPA 18 and GDPR.

21. If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Please contact Human Resources or the Company's Data Protection Officer on [ClaritasGDPR@claritas-solutions.com](mailto:ClaritasGDPR@claritas-solutions.com) or in the final instance the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in May 2019.

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