

# POLICIES

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## JOB APPLICANT PRIVACY NOTICE

### **INTRODUCTION**

As part of any recruitment process, Commercial Group collects and processes 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.

### **What information do we collect?**

Commercial Group collects 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 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 entitlement to work in the UK

Commercial Group may collect this information in a variety of ways. For example, data might be contained in CVs, application forms, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Commercial Group may also collect personal data about you from third parties, such as references supplied by former employers.

Commercial Group will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### **Why does Commercial Group process personal data?**

Commercial Group needs 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 a contract with you.

In some cases, we need to process data to ensure that we are complying with legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts.

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

Commercial Group may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out legal obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Commercial Group may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we retain your data for this purpose and you are free to withdraw your consent to this at any time.

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

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and Recruitment 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. We will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks.

### **How does Commercial Group protect data?**

Commercial Group take the security of your data very seriously. We have internal policies and controls compliant with the ISO 27001:2013 Information Security standard in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

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### **For how long does Commercial Group keep data?**

If your application for employment is unsuccessful, the Commercial Group will hold your data on file for twelve months after the end of the relevant recruitment process for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted and destroyed.

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 during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

### **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 Commercial Group is relying on its

legitimate interests as the legal ground for processing

To exercise any of these rights, please contact Jenny Hodgson, Head of HR. You can contact Jenny on 01242 703443 or via e-mail [jenny.hodgson@commercial.co.uk](mailto:jenny.hodgson@commercial.co.uk)

If you believe that Commercial Group has not complied with your data protection rights, you can complain to the Information Commissioner's Office (ICO) at <https://ico.org.uk/global/contact-us>

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

You are under no statutory or contractual obligation to provide data to Commercial Group 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.