

What is the purpose of this document?

This document is provided in order to comply with our duties as a “data controller” under the General Data Protection Regulations (“GDPR”). As a data controller, we are responsible for controlling how we hold, use and process personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker, consultant, volunteer, intern or contractor). This document sets out how and why your personal data will be used and how long it will usually be retained for.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing data about you, so that you are aware of how and why we are using such information. This Privacy Notice should also be read in conjunction with the Organisation’s Data Protection Policy. A copy of this policy is available upon request.

We have appointed Michelle Fields, HR to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your data, please contact michelle.fields@tryzens.com. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

Data Protection Principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of Information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, salary and specific experience.
- Any information you provide to us during an interview.
- Any task / test results as part of the interview process.
- Any information you provide to us or the results of any pre-employment screening process.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal data collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Relevant recruitment agencies, from which we collect the following categories of data: name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, salary, specific experience, information within your curriculum vitae and covering letter.
- Your named referees, from whom we collect data relating to your previous employment.
- WORKABLE Recruitment Software People Search.

How we will use information about you.

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Assess your right to work in the UK in compliance with immigration rules.
- Communicate with you about the recruitment process.
- Determine whether any adjustments need to be made to the recruitment process, specifically in relation to a disability.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

Under Data Protection laws, data controllers have to explain how data about data subjects is used because they can only use data when they are permitted to do so by law. Data controllers will be permitted to use data by law when they can establish a “Lawful Basis”. The Lawful Basis relevant for processing data about you in the recruitment context is that:-

- It is necessary for the purposes of legitimate interests pursued by us or by a third party.
- It is in our legitimate interests to decide whether to appoint you to the role or provide you with work since it would be beneficial to our business to appoint someone to that role or work.

It is necessary for entering into or performing a contract with a data subject. We need to process your data to decide whether to enter into a contract of employment or work with you.

Change of Purpose

We will only use your data for the purpose for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purposes. If we need to use your data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. We may also process your data without your knowledge or consent, in compliance with the above rules, where this is permitted or required by law.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with such details, we will not be able to take your application further.

How we use particularly sensitive personal information.

Under the GDPR, the processing of “special categories of personal data” is allowed in limited circumstances. Special categories of personal data are sensitive personal information which reveal racial or ethnic origin; political opinions; religious and philosophical beliefs; trade union membership; genetic data; biometric data; health data; and sex life and sexual orientation.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made e.g. during a test.
- We may use any information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about Criminal Convictions

We do not envisage that we will process information about criminal convictions. We may however collect information about your criminal convictions history if we would like to offer you the work (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

Automated Decision-Making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data Sharing

Why might you share my personal information with third parties? We may as part of the recruitment or selection processes share your Data with the following third parties:

- The WORKABLE applicant tracking system
- Parent or Group Companies
- Legal representatives
- Regulators and professional bodies
- Recruiters or reference checking agencies
- Government or statutory bodies
- Non-government bodies
- HMRC
- Insurers, insurance brokers
- Occupational health providers
- Medical practitioners, clinicians, doctors, other health providers and consultants]
- Marketing or PR agencies
- I-cloud service providers
- DVLA
- Disclosure and Barring Service
- Consultants or Contractors working on our behalf

All our third-party service providers, and other entities in the group, are required to take appropriate security measures to protect your personal information in line with our policies. We only permit third parties to process your personal data for specified purposes and in accordance with our instructions.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, consultants, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the HR Department.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

How long will you use my information for?

The GDPR does not specify retention periods for personal data. We are entitled to retain personal data for as long as is necessary to fulfil the purposes we collected it for and to fulfil our legal obligations and business interests. This data may include:

- Completed online application forms or CVs;
- Equal opportunities monitoring forms;
- Assessment exercises or tests;
- Notes from interviews and short-listing exercises;
- Pre-employment verification of details provided by the successful candidate. For example, checking qualifications and taking up references; and
- Criminal records checks.

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations and our Data Retention Policy unless we are required to retain it for legal reasons or need to retain it for legal proceedings.

Rights of Access, Correction, Erasure, and Restriction

Your rights in connection with personal information. Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR Department at 101 Finsbury Pavement, London EC2A 1RS in writing.

Questions about this Document

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