



Privacy Policy for Recruitment Process

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1. Introduction
 - 1.1 In order to comply with its contractual, statutory and management obligations and responsibilities, Nasstar is required to process personal data relating to its recruitment process as defined in the General Data Protection Regulation 2018 (GDPR).
 - 1.2 All such data will be processed in accordance with the provisions of the GDPR and the Nasstar plc Data Protection Policy as amended from time to time. For the purposes of the GDPR, the term 'processing' includes the initial collection of personal data, the holding and use of such data, as well as access and disclosure, through to final destruction. In certain circumstances, the provisions of the GDPR permit Nasstar plc to process a candidate's personal data without their explicit consent. Further information on what data is collected and the purposes for which it is processed is given below.
2. How we use your personal data
 - 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) [in the case of personal data that we did not obtain directly from you, the source and specific categories of that data];
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
 - 2.2 We may process [personal data in relation to your employment application with Nasstar plc] ("candidate application data"). The usage data may include [your name, postal address, employment history and associated personal information contained within your CV]. The legal basis for this processing is our [legitimate interests, namely [to process your application for a live vacancy]].
 - 2.3 We may process [personal data in relation to your employment application with Nasstar plc] ("historic candidate data"). The usage data may include [your name, postal address, employment history and associated personal information contained within your CV]. The legal basis for this processing is [consent, namely [contacting you in relation to a subsequent live vacancy or vacancies that we believe might interest you]].
 - 2.4 We may process [any of your personal data identified in this policy] where necessary for [the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure]. The legal basis for this processing is our legitimate interests, namely [the protection and assertion of our legal rights, your legal rights and the legal rights of others].



- 2.5 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process [any of your personal data] where such processing is necessary[for compliance with a legal obligation to which we are subject, or] in order to protect your vital interests or the vital interests of another natural person.
3. Providing your personal data to others
- 3.1 We may disclose [your personal data] to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.[We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.]
4. Retaining and deleting personal data
- 4.1 This Section 4 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 4.3 We will retain your personal data as follows:
- (a) All personal data [obtained as outlined in Section 2.2] will be retained for a maximum period of [1 Week beyond the closing of the role vacancy].
 - (b) All personal data [obtained as outlined in Section 2.3] will be retained for a period of [6 Months] following the date supplied to us.
- 4.4 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
5. Your rights
- 5.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) the supply of appropriate evidence of your identity [(for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address)].



- 5.2 We may withhold personal information that you request to the extent permitted by law.
6. Data protection officer
- 6.1 Please contact our data protection officer at: [dataprotection@nasstar.com].

