

## Privacy notice for the recruitment and selection process

### WHAT IS THE PURPOSE OF THIS DOCUMENT?

Somerset Bridge Group is committed to protecting the privacy and security of your personal information. Somerset Bridge Group has a number of group companies. The group company which is advertising the vacancy is the relevant “data controller” (referred to as “we”/”us”/”our” throughout the remainder of this notice) and is responsible for deciding how to hold and use personal information about you. If your application for employment is successful, you will be provided with a new employee privacy notice from the Somerset Bridge Group company which makes the offer of employment to you.

This privacy notice describes how we collect and use personal information about you during the recruitment and selection process, in accordance with data protection legislation.

It applies to all candidates and is for information only. This notice does not form part of any contract of employment or other contract to provide services.

It is important that you read and retain this notice so that you are aware of how and why we are using your information and what your rights are under the data protection legislation.

We use Harbour applicant tracking software within the recruitment process, including collecting your data as part of our application process. Harbour, a 3<sup>rd</sup> party application provider, are our data processor for this purpose.

We have a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer, Lysander House, Catbrain Lane, Bristol, BS10 7TQ.

### WHAT INFORMATION DO WE COLLECT?

Personal data, or personal information, means information relating to an identified or identifiable living individual. It does not include data where the identity has been removed (anonymous data) and it would not be possible to identify an individual from this anonymous data.

In connection with your application to work with us, we will collect, store, and use the following categories of personal information about you, if included in your application and supporting documentation:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Previous employment and qualifications history including reference contact details.
- Salary, annual leave, pension and benefits information.
- Start date and, if different, the date of your continuous employment.

- Leaving date and your reason for leaving.
- Location of employment or workplace.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- CCTV footage when visiting our office.
- Records of your communication with us during the recruitment process.
- Good Repute checks carried out pre-employment, any fails to this may be subject to additional Credit and DBS checks. You will be notified and asked for consent, prior to these additional measures.
- SUP 10 (FCA Handbook) – Senior Manager & Certification Regime – Credit check, DBS and regulatory references will be carried out for senior managers and certified persons. This also applies to employees changing roles that fall under the Senior Manager & Certification Regime.

We may also collect, store and use the following more sensitive types of 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 INFORMATION COLLECTED?**

We collect personal information about you through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

## **HOW WE WILL USE INFORMATION ABOUT YOU**

We need the categories of information in the list above to allow us to manage the recruitment process, to make a decision about your recruitment and to take steps to enter into a contract of employment.

In some cases we need to process data to comply with our legal obligations (for example to check your right to work in the UK).

We may use your personal information to pursue legitimate interests (e.g. business management and planning and keeping records of the recruitment process), provided your interests and fundamental rights do not override those interests.

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so.

Where we process special categories of data (e.g. information about sexual orientation, health, ethnic origin,

religion or belief), where appropriate, we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments. We need to process this information to exercise rights and perform obligations in connection with your employment. We will use 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.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process.

If you refuse to provide certain information when requested, we may not be able to recruit you.

## **AUTOMATED DECISION-MAKING**

We do not envisage that any decisions will be taken about you using automated means during the recruitment process, however we will notify you in writing if this position changes.

## **DATA SHARING**

Your data will be shared with Somerset Bridge Shared Services Limited, a group company which provides a range of group operational support services including HR, recruitment, IT, legal, management information, marketing, finance, risk and compliance advice and assistance.

Your information will be shared internally for the purpose of the recruitment exercise. This includes sharing your information with interviewers involved in the recruitment process and managers in the business area with a vacancy.

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

If your application is successful, we will share your data with former employers to obtain your references. We will share data with a provider of any background checks, including criminal records and credit agency checks, where required.

We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

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 do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We and our appointed third party service providers may transfer and process personal information outside the European Economic Area. To ensure the protection of your personal information, transfers are subject to appropriate data safeguards to ensure compliance with data protection laws.

## **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, 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.

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**

The recruitment team will hold your data for 365 days from the date of application, before it is permanently deleted. Any email correspondence, including during the recruitment process, will be retained for 7 years in accordance with our data retention policy.

If you are successful during the recruitment process and are employed by us, your personal information will be retained in a personnel file during and after your employment in accordance with our retention period for employee data and in accordance with our data retention policy.

The Recruitment team will hold interview notes for 4 months from the date of Interview, before it is permanently deleted.

## **YOUR DUTY TO INFORM US OF CHANGES**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the recruitment process.

## **YOUR LEGAL RIGHTS**

You have a number of rights under data protection legislation in relation to your personal data. The rights available to you depend on our reason for processing your information.

- Right of access. You have the right to ask us for copies of your personal information, this is known as a Subject Access Request (SAR). You can always rely on this right, but there are some exemptions, which mean you might not always receive all the information we process;
- Request rectification of Your personal data if it is inaccurate or incomplete;

- Request erasure of Your personal data in certain circumstances;
- Restrict our use of Your personal data in certain circumstances;
- Move (or port) personal data. This only applies to information you have given us. You have the right to transfer the information you gave us from one organisation to another, or for us to give it to you;
- Object to the processing of your data where our legal basis for processing is based on our legitimate interests.

If you would like to exercise any of your data protection rights, please contact the Data Protection Officer using the contact details above.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive and we will inform you of the fee and seek your acceptance of it prior to complying with your request. Alternatively, we could refuse to comply with your request, in part or completely depending on the nature of your request, in these circumstances and we will advise you of the grounds for the refusal or partial refusal.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you as soon as possible and in any event during the one month period and keep you updated as necessary until we have formally responded to your request.

## **COMPLAINTS**

If you have any queries or concerns about this notice or your personal data, please contact the Data Protection Officer via the contact details provided above.

If you remain dissatisfied, or you would prefer not to discuss the issue with us, you can also make a complaint to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

## **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.