

Hinckley and Rugby Building Society

JOB APPLICANT PRIVACY NOTICE

Who we are

Hinckley and Rugby Building Society of Principal Office, Upper Bond St, Hinckley LE10 1NZ is a data controller of your personal information. This means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as 'the Society', we, us and our in this notice, we mean Hinckley and Rugby Building Society. When we use terms such as 'you' and 'your' in this notice, we mean the applicant. We can be contacted at any time including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it by emailing hr@hrbs.co.uk.

Have you been introduced to us by a recruitment consultant or other third party?

When a recruitment consultant processes your personal information on our behalf, this privacy notice will apply and you should contact us to exercise your rights under data protection laws. When a recruitment consultant or other third party processes your personal information as a data controller in its own right, its own privacy notice will apply and you should ask them for a copy if you do not have one by the time you are introduced to us.

Personal information that we generally process in connection with your application or employment

This includes:

- Your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers
- Your home address, correspondence address (where different from your home address) and address history
- Your date of birth and/or age
- Your nationality, if this is necessary, for us to comply with our legal and regulatory requirements
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and MAC address
- Personal information which we obtain from Fraud Prevention Agencies (see the section on Fraud Prevention Agencies below)
- Some special categories of personal data such as about your health
- 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 Society needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief

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

The Society will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The Society will seek information from third parties only once a job offer to you has been made and will inform you that it is 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 the Society process personal data?

The Society needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

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

The Society also seeks information about criminal convictions and offences. Where the Society seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The Society 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 Society to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Society may also need to process data from job applicants to respond to and defend against legal claims.

The Society processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Society processes other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time.

If your application is unsuccessful, the Society will keep your personal data on file in case there are future employment opportunities for which you may be suited. The Society will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent 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 HR, the 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.

Your information may be shared externally with our recruitment partners for the purpose of the recruitment exercise.

The Society will share information with credit reference agencies prior to making you an offer of employment. Once an offer of employment has been made, the Society will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Your data may be transferred to countries outside the European Economic Area (EEA) to obtain employment background checks from third-party providers.

If your data is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us.

Safeguards include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standard required in

the European Economic Area. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

How does the Society protect data?

The Society takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees and our recruitment partners in the proper performance of their duties. If you require further information regarding the Society's policies please contact our Data Protection Officer.

Access to your recruitment data is restricted to those who are part of the recruitment process. This includes members of HR, the 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.

Where the Society engages third parties to process personal data on its behalf, it does so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the Society keep data?

If your application for employment is unsuccessful, the Society will hold your data on file for six months after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file 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 Society to change incorrect or incomplete data;
- require the Society 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 the Society is relying on its legitimate interests as the legal ground for processing; and
- ask the Society to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Society's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Society's Data Protection Officer on 01455 251234 or by email at DataProtectionOfficer@hrbs.co.uk.

If you believe that the Society has not complied with your data protection rights, you can complain to the Information Commissioner.

Automated decision-making

Recruitment processes are not based solely on automated decision-making.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Society during the recruitment process. However, if you do not provide the information, the Society may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.