

Data controller ("the Company"): W R Swann & Co Ltd of Owlerton Green Sheffield S6 2BJ

### *Introduction*

As part of any recruitment process, the Company collects and processes personal information, or personal data, relating to job applicants. This personal information may be held by the Company on paper or in electronic format.

The Company is committed to being transparent about how it handles your personal information, to protecting th

The Company collects, uses, and processes a range of personal information about you during the recruitment process. This includes (as applicable):

- your contact details, including your name, address, telephone number and personal e-mail address
- personal information included in a CV, any application form, cover letter or interview notes
- references
- information about your right to work in the UK and copies of proof of right to work documentation
- copies of qualification certificates
- copy of driving licence
- other background check documentation
- details of your skills, qualifications, experience and work history with previous employers
- information about your current salary level, including benefits and pension entitlements
- your professional memberships

The Company may also collect, use and process the following special categories of your personal information during the recruitment process (as applicable):

- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment processes,
- information about criminal convictions and offences.

*How do we collect your personal information?*

The Company collects personal information about you during the recruitment process either directly from you or sometimes from a third party such as an employment agency. We may also collect personal information from other external third parties, such as references from current and former employers, information from

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We need all the types of personal information listed under "*What types of personal information do we collect about you?*" primarily to enable us to take steps at your request to enter into a contract with you, or to enter into a contract with you, and to enable us to comply with our legal obligations. In some cases, we may also use your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include: pursuing our business by employing employees, workers and contractors; managing the recruitment process; conducting due diligence on prospective staff and performing effective internal administration.

The purposes for which we are processing, or will process, your personal information are to:

- manage the recruitment process and assess your suitability for employment or engagement

- decide to whom to offer a job

comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations

ensure compliance with your statutory rights

ascertain your fitness to work

ensure effective HR, personnel management and business administration

monitor equal opportunities

Where the Company processes other special categories of personal information, i.e. information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation, this is done only for the purpose of equal opportunities monitoring in recruitment and in line with our data protection policy. Personal information that the Company uses for these purposes is either anonymised or is collected with your explicit written consent, which can be withdrawn at any time. It is entirely your choice whether to provide such personal information.

We may also occasionally use your special categories of personal information, and information about any criminal convictions and offences, where it is needed for the establishment, exercise or defence of legal claims.

#### *Change of purpose*

We will only use your personal information for the purposes for which we collected it, i.e. for the recruitment exercise for which you have applied.

However, if your job application is unsuccessful, the Company may wish to keep your personal information on file you have applied.

### *How does the Company protect your personal information?*

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from the Group HR Manager.

Where your personal information is shared with third parties, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The Company also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

### *For how long does the Company keep your personal information?*

The Company will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

If your application for employment or engagement is unsuccessful, the Company will generally hold your personal information for six months after the end of the relevant recruitment exercise but this is subject to: (a) any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records, and (b) the retention of some types of personal information for up to [six years] to protect against legal risk, e.g. if they could be relevant to a possible legal claim in a tribunal, County Court or High Court.

If your application for employment or engagement is successful, personal information gathered during the recruitment process will be retained for the duration of your employment or engagement and in accordance with the privacy notice for employees, workers and contractors.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances we may anonymise your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

### *Your rights in connection with your personal information*

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it

request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected

request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected

restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy

object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground

data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact the Group HR Manager. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact the Group HR Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

#### *Transferring personal information outside the European Economic Area*

The Company will not transfer your personal information to countries outside the European Economic Area.

#### *Automated decision making*