

Applicant Data Protection Privacy Notice

This notice explains what personal information the Society will hold about you should you apply for a job with us, how it will be collected, and how it will be used and shared during your application and afterwards. If you are successful in your application, you will receive further information on how we handle your personal data during your employment with us.

You should read this notice before submitting any personal data to us relating to an application for employment.

The Society has separate privacy notices in place for customers, suppliers and other categories of data subject. A copy of these can be obtained from Tonia Lovell (Data Protection Officer) or from the website.

The Society has taken steps to protect the security of personal information in accordance with our Information Security Policy.

Who collects the personal information

The Society is a 'data controller' and will gather and use certain personal information about you.

Data protection principles

The Society will comply with the 6 data protection principles which state that personal information must;

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate personal information must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

Your data protection rights

You have the following rights relating to your personal information -

Right to be informed – about the collection and use of your personal information.

Right to erasure - the right to request that your personal information be deleted.

Right of access and data portability – the right to ask for a copy of the personal information the Society holds about you.

Right to rectification - the right to have any errors in your personal information corrected.

Right to restrict processing - the right to ask that personal information processing be restricted.

Right to object – the right to object to certain types of processing.

About the personal information we will collect

'Personal information' means information which relates to a living person who can be identified from that information on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal information whether it is stored electronically, on paper or in any other form. Please see below for more detail about the personal information we will collect and hold, how and why we will do so, how we will use it and with whom it may be shared. A summary table is also included at the end of this notice.

How we define special categories of personal information

'Special categories' are information about:

- your racial or ethnic origin;
- your political opinions;
- your religious or philosophical beliefs;
- your health;
- your sex life and sexual orientation; and
- any criminal convictions and offences.

We do not collect such information at the application stage, but may hold and use some should you be successful in your application, in accordance with the law.

How we define processing

'Processing' means any operation which is performed on personal information such as:

- collection, recording, organisation, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction or erasure.

How we process your personal information

The Society will process your personal information for the following reasons:

- to consider your application for employment with us;
- to comply with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing.

We can process your personal information for these purposes without your knowledge or consent. We will not use your personal information for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

We do not need your consent to process special categories of your personal information when we are processing it for the following purposes, which we may do:

- where it is necessary for carrying out rights and obligations under employment law;
- where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- where you have made the information public;
- where processing is necessary for the establishment, exercise or defence of legal claims;
- where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity;
- for a criminal records check, should your application be successful.

If your application is successful, we might process special categories of your personal information for the following reasons -

- your race, ethnic origin, religion, sexual orientation or gender to monitor equal opportunities;
- to assess your fitness for work, to comply with our legal obligations under employment law including to make reasonable adjustments and to look after your health and safety; and
- any criminal convictions, to assess suitability for the role and to satisfy regulatory obligations

We do not use profiling or take automated decisions using your personal information.

Sharing your personal information

Personal information may be shared with other parties, such as external contractors and our professional advisers (e.g. legal and financial advisers), HR advisers. The recipient of the personal information will be bound by confidentiality obligations. We may also be required to share some personal information to comply with the law. We seek to ensure that our personal information collection and processing is always proportionate. We will notify you of any material changes to personal information we collect or to the purposes for which we collect and process it.

Sometimes we might share your personal information with business partners, contractors and agents to carry out our obligations under our contract with you or for our legitimate interests.

We require those companies to keep your personal information confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your personal information for the lawful purpose for which it has been shared and in accordance with our instructions.

Where personal information may be held

Personal information may be held at our offices and third-party agencies, service providers (such as Credit Reference Agencies – see below), representatives and agents, and in cloud-based IT services. Some of these may transfer personal information to countries both inside and outside the European Economic Area (EEA). Whenever information is sent outside the UK, we will ensure there are suitable safeguards to protect it, to the same standards as apply within the UK.

Links to privacy information for Credit Reference Agencies (CRAs) can be found at the end of this privacy notice.

How long we keep your personal information

If you are successful in your application, we will provide you with further information relating to retention of your personal data.

In the event that your application is unsuccessful, we will destroy your personal information within six months, unless you give your consent for us to keep it for a longer period in case of future opportunities within the Society.

Your rights to correct and access your personal information and to ask for it to be erased

Please contact the DPO, if (in accordance with applicable law) you would like to correct or request access to personal information that we hold or if you have any questions about this notice. You also have the right to ask our DPO for some, but not all, of the personal information we will hold and process to be erased (the 'right to be forgotten') in certain circumstances.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing personal information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Criminal records information

If your application is successful, we will carry out Disclosure and Barring Service (DBS) checks (including requesting a criminal record certificate, enhanced criminal record certificate or a search of the children's or adults' barred list) prior to you starting your role with the Society. We will keep a record that the DBS check was completed and whether it was satisfactory; however, the check itself will usually be disposed of securely unless we feel it is relevant to the ongoing employment relationship, in which case it will be kept securely for six months (unless relevant for regulatory inspections in which case it will be retained until the next inspection).

Credit Reference Agency checks

If your application is successful, prior to beginning your new role, the Society will provide your personal information to one or more Credit Reference Agency (CRA). In return, the CRA will provide us with information, such as your address and financial history. We do this as part of personal vetting, including checking identity, suitability for the role and to satisfy regulatory requirements for certain roles. Depending on your role, we may continue to exchange information about you with CRAs while you are employed by the Society. Our CRA checks will not be seen by other institutions. Details of where to find privacy information for CRAs can be found at the end of this privacy notice.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Data processing summary

The information we may collect as part of your application	How we collect the information	Why we collect the information (including legitimate interest)	How we use and may share the information
Your name, contact details, other employment records <input type="checkbox"/>	From you	PTC, GEP	PTC, SA Share: Personnel, FCA/PRA (if required)
Your qualifications and any professional status <input type="checkbox"/>	From you	PTC, GEP	PTC Share: Personnel, FCA/PRA (if required)
CV, job application form, interview notes, references received.	From you, consultants, previous employers and other referees	PTC, LO, GEP, SWP	PTC Share: Personnel

If your application is successful, criminal records information, including the results of DBS checks * <input type="checkbox"/>	From you, the DBS	PTC, LO, SPI	PTC, LO Share: Personnel, DBS, other regulatory authorities (if required)
If your application is successful, personal vetting checks.	From CRAs, from previous employers and other referees.	PTC, LO, SPI	PTC, LO Share: Personnel, CRAs, other regulatory authorities (if required)

Key to table

LO – to ensure compliance with legal and/or regulatory obligations

PTC – to enter into/perform the contract

SA – staff administration

Personnel – relevant managers, HR, professional advisors, payroll and consultants

GEP – to maintain employment records and for good employment practice

SPI - for reasons of substantial public interest (e.g. equal opportunities, prevention and/or detection of unlawful acts)

SWP – to ensure safe working practices

If your application is successful, you will be required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked '' above to us to enable us to verify your right to work and suitability for the position. If you do not provide this information, we may not be able to proceed with your appointment.

Data privacy notices from other organisations.

We have mentioned that we share your personal information with Credit Reference Agencies, Money Laundering Prevention Services and Fraud Prevention Agencies. Further information and the relevant Privacy Notices are available on request.

The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at <https://ico.org.uk/your-data-matters/>. A Credit Reference Agency Information Notice (CRAIN) is also accessible from each of the three CRAs – following any of these three links will also take you to the same CRAIN document:

TransUnion www.transunion.co.uk/crain

Equifax www.equifax.co.uk/crain

Experian www.experian.co.uk/crain

