

# Applicant Privacy Notice

Updated May 2023



## Policy Statement

As part of our recruitment process, On A Roll Sandwich Company Ltd [the data controller] collects and processes personal data relating to job applicants. The company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice sets out, in our data protection obligations, the types of data that we collect and hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

## Data Protection Principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper in the course of processing your application in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

## What information does the company collect?

The company collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number
- 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 company needs to make reasonable adjustments during the recruitment process
- information about your entitlement to work in the UK

The company may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

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 company process personal data?

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

# Applicant Privacy Notice

Updated May 2023



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

The company may process information about whether applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

The company will not use your data for any purpose other than the recruitment exercise for which you have applied, unless you give us additional, explicit consent which is given freely.

## Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, 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.

The company will not share your data with third parties unless your application for employment is successful and it makes you an offer of employment. The company will then issue you with the Employee Privacy Notice.

The company will not transfer your data outside the European Economic Area.

## How does the company protect data?

The company takes the security of your data seriously. The company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. The company uses system restrictions and password protection to limit access to your data.

## For how long does the company keep data?

If your application for employment is unsuccessful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, the company will hold your data on file for 12 months after the end of the relevant recruitment process. At the end of that period your data is deleted or destroyed.

# Applicant Privacy Notice

Updated May 2023



If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for 2 years once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personal file and retained during your employment. The periods for which your data will be held will be provided to you in the Employee Privacy Notice.

## Your rights

As a data subject, you have several rights. You can:

- access and obtain a copy of your data on request
- require the company to change incorrect or incomplete data
- require the company 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 company is relying on its legitimate interests as the legal ground for processing.

If you would like a copy of your data, there is not normally any charge for such a request, however, if your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

If you would like to exercise any of these rights, please contact the HR Department.

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

## What if you do not provide personal data?

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

## Automated decision-making

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