

# Job Applicant Privacy Notice

**Document Control**

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## **1 Introduction**

- 1.1 As with any recruitment process, Woodley Equipment Company (Woodley) collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

## **2 Data Controller**

- 2.1 The data controller is:
- 2.1.1 Woodley Equipment Company Ltd, Old Station Park Buildings, St John Street, Horwich, Bolton, BL6 7NY.
  - 2.1.2 Email Address: [dataprivacy@woodleyequipment.com](mailto:dataprivacy@woodleyequipment.com)

## **3 Data Protection Officer**

- 3.1 Woodley is not required to and does not have a Data Protection Officer.
- 3.2 We do not require a Data Protection Officer because we are not a public authority and our core activities do not involve large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking) or large scale processing of special categories of data or data relating to criminal convictions and offences.
- 3.3 If you have any questions about how your personal data is processed as a job applicant please contact the HR & Policy Manager at the address given in Section 2.

## **4 What information does Woodley collect?**

- 4.1 Woodley collects and processes a range of information about you. This includes:
- 4.1.1 your name, address and contact details, including email address and telephone number, date of birth and gender;
  - 4.1.2 details of your qualifications, skills, experience and employment history;
  - 4.1.3 information about your current level of remuneration, including benefit entitlements;
  - 4.1.4 information about your entitlement to work in the UK;
  - 4.1.5 whether you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
  - 4.1.6 equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
- 4.2 Woodley may collect this information in a variety of ways; for example: data might be collected from application forms or CVs, obtained from your passport or other identity documents; or collected through interviews or other forms of assessment.
- 4.3 Woodley may also collect personal data about you from third parties, such as references supplied by former employers. Woodley will only seek information from third parties once a job offer has been made.
- 4.4 If you attend one of our sites e.g. for an interview, we have CCTV in operation for security and crime prevention purposes around the exterior of our buildings. Our lawful basis for processing this data is legitimate interests. There are signs showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are erased after 30 days unless an issue is identified that requires investigation (such as criminal damage or theft).

- 4.5 Your personal 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).

## **5 Why does Woodley process personal data?**

- 5.1 We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you.
- 5.2 In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.
- 5.3 We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.
- 5.4 Where we rely on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of job applicants and have concluded that they are not.
- 5.5 We process health information only if you provide it freely (we do not request it from you) and only in so far as is required so we can make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.
- 5.6 We will not use your data for any purpose other than the recruitment exercise for which you have applied.

## **6 Who has access to data?**

- 6.1 Your information will be shared internally for the purposes of the recruitment exercise. This includes members of HR, 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.
- 6.1.1 Shared internally also includes sharing your information with officers and staff of our associate company Woodley Equipment Company, Inc if their access is necessary for the proper performance of their roles in relation to the recruitment exercise you are involved with.
- 6.2 We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share limited data (such as your name) with former employers to obtain references for you.
- 6.3 Your data will only be transferred outside of the EEA, if it needs to be shared with our associate company Woodley Equipment Company, Inc. These transfers are done with the appropriate safeguards and data transfer contractual mechanisms in place.

## **7 How does Woodley protect data?**

- 7.1 Woodley takes the security of your data seriously. We have policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees in the proper performance of their duties.
- 7.2 Where Woodley engages third parties to process personal data on its behalf, they do 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 the data.

## **8 How long does Woodley keep the data?**

- 8.1 If your application for employment is unsuccessful, we will hold your personal data on file for 6 months after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed.
- 8.1.1 If you have attended an interview and provided evidence of your Right to Work in the UK – this data will be destroyed or deleted within 2 weeks of the interview date.
- 8.2 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 our employee privacy notice.

## **9 Your rights**

- 9.1 Individuals have the following rights regarding Personal Data processing and the data that is collected and held about them:
- 9.1.1 the right to be informed;
- 9.1.2 the right to rectification;
- 9.1.3 the right to erasure (also known as the 'right to be forgotten');
- 9.1.4 the right to restrict processing;
- 9.1.5 the right to data portability;
- 9.1.6 the right to object;
- 9.1.7 rights with respect to automated decision-making and profiling.
- 9.2 As a data subject you can:
- 9.2.1 Access and obtain a copy of your data on request;
- 9.2.2 Require Woodley to change incorrect or incomplete data;
- 9.2.3 Require Woodley to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- 9.2.4 Object to the processing of your data where Woodley is relying on its legitimate interests as the legal ground for processing.
- 9.2.5 Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.
- 9.3 If you would like to exercise any of these rights, please contact the HR & Policy Manager at the address given in Section 2.
- 9.4 If you believe that the organisation has not complied with your data protection rights you can complain to the Information Commissioner.

## **10 What if you do not provide personal data?**

- 10.1 You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.
- 10.2 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.

## **11 Automated decision making.**

11.1 Recruitment decisions are not based on automated decision-making.