

PRIVACY NOTICE FOR JOB APPLICANTS

INTRODUCTION

Thank you for applying for a job at C. Brewer & Sons Ltd, trading as Brewers ("the Company").

Our recruitment process will inevitably involve us obtaining/receiving personal information about you. This may include 'special categories' of personal information (essentially meaning information that is sensitive in nature). We are committed to protecting the privacy and security of your personal data.

This privacy notice details how we will use personal information about you in connection with our recruitment process, in accordance with the General Data Protection Regulation (GDPR).

DATA PROTECTION PRINCIPLES

We will comply with data protection law when processing your personal information. This means that the personal information we hold about you will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about;
- kept securely.

THE KIND OF INFORMATION WE WILL HOLD ABOUT YOU

Personal data is any information about you from which you can be identified.

We may collect and process the following personal information in connection with our recruitment process:

- The information you (or your recruitment agent) have supplied to us (e.g. in your curriculum vitae and covering letter);
- The information you have provided on your application form, including your name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, driving licence information, previous salary information and any other information gathered from the application form
- Any information you provide to us during an interview;
- Identification used to check your right to work eligibility which may include details of your passport, birth certificate, visas, P45s and NI number
- Any information obtained as part of the selection process, including (if used) assessment or test results, including psychometric assessments.

In addition we may process 'special categories' of personal data about you that are of a sensitive nature, such as information regarding your ethnic origin, criminal offences/convictions history, and medical information.

FROM WHOM WILL WE OBTAIN/RECEIVE PERSONAL INFORMATION ABOUT YOU

We may collect personal information about job applicants from the following sources:

- You, the candidate.
- Recruitment/employment agencies, from which we may obtain/receive the following categories of data: personal information and work history, as may be found on an application form or CV;
- Vacancy Filler Recruitment Solutions, a recruitment process solution provider, from which we may obtain/receive the following categories of data: the information you provide when you apply for a role;
- Vero Screening Ltd, a background check provider, from which we may obtain/receive the following

categories of data: information relating to your career history to enable us to obtain and process appropriate references; once we have offered you the position

- Duradiamond Healthcare, an Occupational Healthcare provider, from which we may obtain/receive the following categories of data: a report specifying whether or not you are fit to work after we have offered you the position;
- Data from third parties is from a publicly accessible source such as LinkedIn.

HOW WE USE YOUR PERSONAL INFORMATION

We will use the personal information we collect about you to:

- assess your skills, qualifications, and suitability for the work/role for which you are being considered;
- carry out background and reference checks, where applicable;
- communicate with you (either directly or through Vacancy Filler Recruitment Solutions) about the recruitment process;
- keep records related to our recruitment processes;
- comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to a role, since it would be beneficial to our business to appoint someone to the role for which you have applied.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to comply with our legal obligations (such as safeguarding checks or to make any reasonable adjustments needed during the recruitment process), and we may not be able to process your application successfully. For example, if we require a credit check or references for the role and you fail to provide us with relevant details, we will not be able to take your application further.

HOW WE WILL USE 'SPECIAL CATEGORIES' OF PERSONAL INFORMATION

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for processing such information.

We may use 'special categories' of sensitive personal information about you for the following reasons:

- We may use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made to an interview process;
- We may use information about your ethnic origin to ensure meaningful equal opportunity monitoring and reporting.

In limited circumstances, we may ask you for your explicit consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that you are not obliged to give consent.

COLLECTING INFORMATION ABOUT CRIMINAL CONVICTIONS

We may occasionally use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

We will only collect information about criminal convictions if it is appropriate given the nature of the role for which you have applied, and where we are legally permitted to do so.

WITH WHOM WE SHARE DATA (INCLUDING YOUR PERSONAL INFORMATION)

We may share your data with third parties, including third-party service providers and other entities in our corporate group.

We may share your personal information with the following third parties for the purposes of processing your application:

- Vacancy Filler Recruitment Solutions, a recruitment process solution provider, for the purposes of reviewing your application and arranging interviews/assessments;
- Vero Screening Ltd, a background check provider, for the purposes of obtaining references;
- Your named referees, for the purposes of carrying out reference checks;
- Duradiamond Healthcare, an Occupational Healthcare provider, for the purposes of them being able to contact you to enable Duradiamond to assess if you are fit to carry out your role, after you have been offered the position.

We may also need to share your personal information to comply with the law.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the European Economic Area ("EEA") if it is necessary to do so, for example if the job that you are applying for involves any work overseas. If we do, you can expect a similar degree of protection in respect of your personal data.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you during the recruitment process using automated means. However, we will notify you in writing if this position changes.

DATA SECURITY

We have put in place measures to protect the security of your information and procedures to deal with any suspected data security breach. Details of these measures are available upon request. We will notify you and any suspected breach where we are legally required to do so.

We take steps to ensure that third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

HOW LONG WE MAY USE PERSONAL INFORMATION

We will only retain your personal information for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, record keeping, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In the event that you are unsuccessful in your application, we will retain personal information about you for a period of six months after we have communicated our decision to you. We retain your personal information for that period so that we can show, in the event of a dispute, that we have not unlawfully discriminated against candidates and that we have conducted the recruitment exercise in a fair and transparent way. Your application form, CV and information relating to the outcome of the recruitment process will remain on Vacancy Filler for a period of 24 months to inform us regarding any subsequent applications you make within this time period.

In the event that you are successful in your application, we will retain personal information about you throughout the duration of your employment with us, and for a period thereafter known as a retention period (determined in accordance with our data protection policy).

After the applicable retention period, we will securely destroy your personal information in accordance with applicable laws and regulations. If we wish to retain your identifiable personal information on file beyond our normal retention period, on the basis that a further opportunity may arise in future and we might wish to consider you for it, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

WHAT ARE YOUR RESPONSIBILITIES?

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes, or if you realise that the information we have received about you is inaccurate.

WHAT ARE YOUR RIGHTS?

Under the GDPR law you have the right to:

- the fair processing of your personal data and transparency over how we use it;
- access to your personal information;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to request the transmission of this data to a third party in certain circumstances;
- object to our continued processing of your personal information in certain circumstances;
- otherwise restrict our processing of your personal information in certain circumstances.

We may need to request specific information from you to help us confirm your identity and ensure you have the right to access the information (or to exercise any other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

CONSENT (INCLUDING WITHDRAWAL)

In the limited circumstances where you may 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. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes to which you originally consented, unless we have another legitimate basis for doing so in law. In certain circumstances, withdrawal of consent could mean that we are unable to successfully process your application.

HOW TO COMPLAIN

We hope that we can quickly resolve any query or concern you raise about our use of your information.

The GDPR also gives you a right to lodge a complaint with a supervisory authority, in particular in the EEA state where you work, normally live, or where any alleged infringement of the GDPR has occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 24 May 2018.

We may change this privacy notice from time to time. When we do, updates will be posted on our website].

HOW TO CONTACT US

If you have any questions about this privacy notice or the information we hold about you, please contact our Recruitment Team using any of the following methods:

- Email address: recruitment@brewers.co.uk
- Telephone number: 01323 411080
- Postal address: C Brewer & Sons Ltd, Albany House, Ashford Road, Eastbourne, East Sussex, BN21 3TR

DO YOU NEED EXTRA HELP?

If you would like this notice in another format please contact us (see 'How To Contact Us' above).

C.Brewer & Sons Ltd
24 May 2018