

Job Applicant Privacy Notice

IMPORTANT DETAILS

Data Controller: Tradebe UK
Data Compliance Officer (DCO): Chris Barnes, HR Director

INTRODUCTION

As part of TRADEBE's recruitment process, it is necessary for us to collect and process personal information relating to **job applicants**. We are committed to being transparent about how we collect and use that information and to meeting our data protection obligations.

Accordingly TRADEBE is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal information will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (**GDPR**).

DATA PROTECTION PRINCIPLES

We will always comply with data protection law and principles, which means that your personal information will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly 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

WHAT INFORMATION DO WE COLLECT?

We may need to collect and process a range of personal information about you. This includes:

- Your name, title, address and contact details, including email address and telephone number
- A copy of your CV that details 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 organisation needs to make reasonable adjustments during the recruitment process or in connection with your future role
- Information about your entitlement to work in the UK
- Any additional information that you have provided on our application form, including date of birth and gender
- Any information you provide to us during an interview

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, religion beliefs and political opinions
- Information about your health, including any medical condition, health and sickness records

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

In some cases, we may collect personal information about you from third parties, such as references supplied by former employers. We only seek information from third parties once a job offer has been made and we will inform you that we are doing so.

Your personal information may be stored in a range of different media, including in your application record, in our HR management application and in other IT systems including the organisation's email system.

WHY DO WE PROCESS PERSONAL INFORMATION?

TRADEBE needs to process your personal information in order to effectively carry out our recruitment processes prior to potentially entering into an employment contract with you. Processing your personal information is necessary to assess and confirm a candidate's suitability for employment, and decide to whom to offer a job. It is in our legitimate interests to decide whether to appoint you to role since it would be beneficial to our business to appoint someone to that role.

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

- Assess your skills, qualifications, and suitability for the role
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process
- Keep records related to our hiring processes
- Comply with legal or regulatory requirements

In some cases, we need to process your personal information 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 prior to commencing employment. We may also process personal information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability.

Where the organisation processes other special categories of your personal information, such as information about ethnic origin, sexual orientation, health or religious beliefs or political opinions, this is for equal opportunities monitoring purposes.

If your application is unsuccessful, we may keep your personal information on file in case there are employment opportunities in the near future or elsewhere in the organisation for which you may be suited. The organisation will ask for your consent before it keeps your personal information for this purpose and you are free to withdraw your consent at any time.

Having received your CV and covering letter or your application form and the results from any tests that you take, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references any carry out any other necessary checks (such as qualifications, medical checks or other regulatory requirements before confirming your appointment.

WHO HAS ACCESS TO YOUR PERSONAL INFORMATION?

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 information is necessary for the performance of their roles. If you choose to send your CV via other TRADEBE mailbox options those accessing these mailboxes will also have access to this information but will delete it as soon as it is sent to the HR department.

We will not share your personal information with third parties, unless your application for employment is successful and we make you an offer of employment. The organisation may then share your personal information with former employers to obtain references for you.

The organisation will not transfer your personal information outside the European Economic Area.

HOW DO WE PROTECT PERSONAL INFORMATION?

TRADEBE takes the security of your personal information seriously and therefore has internal policies and controls in place to ensure that your personal information is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by authorised persons in the performance of their legitimate duties. More information on this can be found in the IT Security Policy or on request from the DCO.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

HOW LONG DO WE KEEP PERSONAL INFORMATION?

If your application for employment is unsuccessful, we will hold your personal information on file in our systems for up to 6 months after the end of the relevant recruitment process. It is kept for this period in the event that a claim is brought against the organisation so that we can show that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

At the end of that period, your personal information is securely deleted or destroyed.

If, during this period, the hiring manager feels you may be suitable for another role, they will contact our recruitment team who will request your consent for us to send this on. Information will only be shared with another hiring manager if we obtain your consent.

If your application for employment is successful, personal information gathered during the recruitment process will be transferred to your personnel file and retained during your employment.

The periods for which your personal information will be held will be provided to you in the employee privacy notice.

YOUR RIGHTS

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

- Access and obtain a copy of your personal information on request
- Request that we change incorrect or incomplete your personal information
- Request that we delete your personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- Object to the processing of your personal information where TRADEBE is relying on a legitimate interest (or those of a third party) as the legal ground for processing it and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

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

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your 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.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer 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 the DCO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

WHAT IF YOU DO NOT PROVIDE PERSONAL INFORMATION?

You are under no obligation to provide personal information to TRADEBE during the recruitment process. However, if you do not provide certain personal information we may not be able to process your application properly or at all.

AUTOMATED DECISION MAKING

TRADEBE never rely solely on automated decision making in our recruitment processes.



DATA COMPLIANCE OFFICER

We have appointed a data Compliance officer (DCO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DCO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

I acknowledge, I have received a copy of TRADEBE's Candidate Privacy Notice and that I have read and understood it.

Signature.....

Name.....