

Job Applicant Privacy Notice

Data controller: PTL Governance Ltd, 4th Floor, The Anchorage, 34 Bridge Street, Reading, RG1 2LU

Data protection manager: Dawn Harris dharris@ptluk.com

Introduction

As part of our recruitment process, PTL Governance Ltd (the "Company") collects and processes personal data relating to job applicants. We are committed to protecting the privacy and security of your personal data. This privacy notice sets out how we collect and use that data and how we meet our data protection obligations.

Further information on the Company's commitment to complying with our data protection obligations, individuals' rights and obligations in relation to the processing of personal data whilst working for or on behalf of the Company, and the basis on which we will process any personal data we collect or that is provided to us, can be found in the Company's Data Protection Policy.

What information does the Company collect?

The Company collects and processes the following categories of information about you:

- personal contact details such as your name, title, home address, personal email address and contact telephone numbers (as provided on your CV or application form)
- details of your qualifications, skills, experience and employment history and other information included in a CV or cover letter or as part of the application process, including start and end dates with previous employers and references
- information about your current level of remuneration, including benefit entitlements
- CCTV footage, if you have attended the Company's premises for an interview; and
- information about your entitlement to work in the UK if this information has been provided during the interview and selection process

We may also collect and process the following "special categories" of more sensitive personal data:

- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process; and
- information about your race or ethnic origin as shown on your passport only.

How will the Company collect this personal data?

The Company collects this information in a variety of ways: from correspondence with you; from information contained in your application form, CV and any cover letter; or collected through interviews, meetings or other forms of assessment, including online tests; and other information provided directly by you.

Internet searches may be used by the Company as part of due diligence processes on candidates in the course of recruitment and selection. Social media platforms, which may include Facebook, Twitter, LinkedIn and Instagram may be viewed for these purposes.

The Company may also collect personal data about you from third parties, such as references supplied by former employers, information from employment agencies, information from employment background check providers, from the Disclosure and Barring Service (DBS), and/or credit reference agencies. The Company will seek information from third parties only once a job offer to you has been made [with your consent only] and will inform you that it is doing so.

Where will personal data be stored?

Data will be stored on your application record, in the Company's HR management systems and on other IT systems (including the Company's email system). All IT systems have restricted access, and are protected by password access, a firewall and anti-virus software.

Why does the Company process personal data?

The Company needs to process data prior to entering into a contract with you in order to run an effective recruitment process. It may also need to process your data to enter into an employment contract with you.

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 an effective recruitment process, assess and confirm a candidate's suitability for employment and decide who to offer a job to. If you are successful, the Company will also need to process your personal data in order to decide the terms on which it will enter into an employment contract with you. The Company may also need to process data from job applicants to respond to, defend against and otherwise deal with legal disputes involving you or other job applicants, our employees, workers or contractors.

The Company will process the "special categories" of data listed above in the following circumstances:

- where we need to carry out our legal obligations or exercise rights in relation to your application
- where it is needed in the public interest, such as for equal opportunities monitoring; and/or

- in limited circumstances where it is needed in relation to legal claims

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

We will use the "special categories" of personal data in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety and to provide appropriate adjustments during the application process
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs and your sexual orientation to ensure meaningful equal opportunity monitoring and reporting. Data that the Company uses for these purposes is anonymised or is collected with your express consent, which can be withdrawn at any time. You are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

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

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes interviewers and others involved in managing 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 share your data with third parties in order to contact former employers to obtain references for you, obtain employment background checks from third party providers including credit reference checks and to obtain necessary DBS checks from the Disclosure and Barring Service, to provide information required by a regulator or to otherwise comply with the law or where we have another legitimate interest in doing so.

The Company will not transfer your personal data to countries outside the European Economic Area.

Automated decision-making

Recruitment processes are not based solely on automated decision-making, examples of which may include online recruitment and selection testing.

How does the Company protect data?

The Company takes the security of your data seriously. It has internal policies and controls in place to prevent your data from being lost, accidentally destroyed, misused or disclosed, and to ensure it is not accessed except by the Company's employees and other staff in the proper performance of their duties. Application records are stored in a secure, locked cupboard and on the Company's email system/server, which is protected by password access, a firewall and anti-virus software.

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.

For how long does the Company keep data?

If your application for employment is unsuccessful, the Company will hold your data on file for six months after the end of the relevant recruitment process for the purposes of satisfying any legal, accounting, or reporting requirements and for consideration for future employment opportunities. At the end of that period your data is deleted or destroyed.

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 a new privacy notice.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your rights

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

- access and obtain a copy of the personal data we hold about you on request
- require the Company to correct inaccurate or incomplete personal data
- require the Company to delete or stop processing your personal data where there is no good reason for us continuing to process it or where you have exercised your right to object to processing (See below)
- object to the processing of your personal data where the Company is relying on its legitimate interests (or those of a third party) as the legal ground for processing
- request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, 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 Dawn Harris at dharris@ptluk.com.

If you believe that the Company has not complied with your data protection rights, you have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

It is important that the personal information we hold about you is accurate and current. Please inform Dawn Harris at dharris@ptluk.com if your personal information changes during the application process.

You will not normally 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.

In the limited circumstances where your personal data is processed based on your consent 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 Dawn Harris at dharris@ptluk.com. 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 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.

If you have any questions about this privacy notice or how we handle your personal information, please contact Dawn Harris at dharris@ptluk.com.