

21ST MAY 2018

PARETO FACILITIES MANAGEMENT LTD
GDPR DATA PROTECTION PRIVACY NOTICE (RECRUITMENT)

Pareto Facilities Management Ltd

Data protection privacy notice (Recruitment)

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

WHO COLLECTS THE INFORMATION

Pareto Facilities Management Ltd ('Company') is a 'data controller' and gathers and uses certain information about you and in this notice, reference to 'we' means the Company.

DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection (Employment) Policy.

[ABOUT THE INFORMATION WE COLLECT AND HOLD

WHAT INFORMATION

We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name and contact details (ie address, home and mobile phone numbers, email address);
- Details of your qualifications, experience, employment history (including job titles[, salary] and working hours) and interests;
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;
- [Information regarding your criminal record;]
- Details of your referees.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers ;
- Information regarding your academic and professional qualifications ;
- Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) if required ;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ;
- A copy of your driving licence .

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '' above to us to enable us to verify your right to work and suitability for the position.

HOW WE COLLECT THE INFORMATION

We may collect this information from you, your referees (details of whom you will have provided), your education provider, the relevant professional body, the Disclosure and Barring Service (DBS) (only required for certain roles) and the Home Office.

WHY WE COLLECT THE INFORMATION AND HOW WE USE IT

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our Data Protection Policy).

- to take steps to enter into a contract;
- for compliance with a legal obligation (eg our obligation to check that you are eligible to work in the United Kingdom);
- for the performance of a task carried out in the public interest; and
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

HOW WE MAY SHARE THE INFORMATION

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

SENSITIVE PERSONAL INFORMATION [AND CRIMINAL RECORDS INFORMATION]

Further details on how we handle sensitive personal information including a CRIMINAL RECORDS POLICY and INFORMATION SECURITY POLICY are set out on our website as required under Data Protection.

ABOUT THE INFORMATION WE COLLECT AND HOLD

The table set out in Part 1 of the schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part 2 of the schedule below summarises the additional information we collect before making a final decision to recruit, ie before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

WHERE INFORMATION MAY BE HELD

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above.

HOW LONG WE KEEP YOUR INFORMATION

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend

on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our Data Protection Privacy (Employment) Policy.

Further details on our approach to information retention and destruction are available in our Data Protection Policy or Record Retention Policy and your rights to correct and access your information and to ask for it to be erased. These can be obtained from Di Arthur, HR Manager – di@paretofm.com

Please contact our HR Manager, Di Arthur – di@paretofm.com if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask the HR Manager for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. The HR Manager will provide you with further information about the right to be forgotten, if you ask for it.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

HOW TO COMPLAIN

We hope that our HR Manager, Di Arthur can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

THE SCHEDULE- ABOUT THE INFORMATION WE COLLECT AND HOLD

Part 1 - Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel [or the manager of the relevant department] to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles[, salary] and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies
Information regarding your criminal record	From you, in your completed application form	To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector (and protecting the public against dishonesty))	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

Part 2 - Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/>	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider[, from the relevant professional body]	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) <input type="checkbox"/> This information is only required for specific roles within the Company	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you	To make an informed recruitment decision] To carry out statutory checks
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence <input type="checkbox"/> Only required for specific roles where driving required to undertake the role.	From you	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving licence Information may be shared with our insurer

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information [and information relating to criminal convictions and offences are set out in our Data Protection (GDPR) Policy, Criminal Records Policy and Privacy Notice, details of which can be obtained from Di Arthur, HR Manager, di_arthur@paretofm.com