



Job Applicant Privacy Notice

Introduction

This Privacy Notice sets out why we collect data about you, the types of data we collect, who we will share this data with, how we will protect this data and how long we will hold it for.

Yarlington is committed to safeguarding the privacy of the personal data that we gather concerning our prospective colleagues.

This notice applies to all prospective colleague data and to the use of that data in any form, whether spoken, electronic or written. If an applicant becomes employed, there is a separate Colleague Privacy Notice in place for Yarlington colleagues.

As part of our recruitment process, Yarlington collects and processes personal data pertaining to applicants.

Yarlington is committed to transparency of how it collects and uses that data and to meet its data protection obligations.

It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your data during the application process so that the information which we hold is accurate and complete.

The data we collect

Yarlington recruits in conjunction with our preferred recruitment partner, Networkx. When utilising the Networkx website and submitting applicant information, you are agreeing to the use of such data in accordance with this privacy notice.

As defined by the General Data Protection Regulation (GDPR) Yarlington is the Data Controller and ultimately responsible for ensuring the data you provide is kept secure, processed correctly and that you understand your legal rights in relation to the data you provide. As part of our Data Controller responsibilities we have an assigned Data Protection Officer (or equivalent).

Our Data Protection Officer can be contacted at **GDPR@yhg.co.uk**

Networkx ensure generally accepted standards of technological security for the purpose of protecting data provided by visitors from misuse, loss or corruption. Only authorised Networkx and Yarlinton personnel have access to personally identifiable data submitted through the website. Such employees are required to maintain the confidentiality of this sensitive data.

The recruitment software Networkx use is supplied by Net-Worx (2001) Ltd (trading as Networkx) and they are defined as a Data Processor under the GDPR. They will only process your data in accordance with Yarlinton's instructions.

Networkx can be contacted at: The Engine House, Wharfebank Business Centre, Ilkley Rd, Otley LS21 3JP.

The Data Protection Officer for Networkx can be contacted at dpo@networkxrecruitment.com

Through the Networkx software, we will only collect personally identifiable data that is specifically and voluntarily provided by you as an applicant, including:

- **Personal Details** – including name, address, D.O.B, marital status and gender;
- **Contact Details** – including personal email addresses and personal telephone numbers;
- **Previous employment details** – including your CV/application form providing previous workplaces, roles and employment history;
- **Experience details** – including your qualifications, skills, experience, professional body memberships and accreditations;
- **Remuneration details** – including current salary level and benefit entitlements;
- **Job-related details** – including responses to behavioural or technical related questions; and
- **Eligibility to work details** – including your proof that you are eligible to work in the UK which could include passport or other documentation;

Some of the information which we will collect may be special categories of personal data (also referred to as sensitive personal data). This may include:

- Information about your **race, ethnicity, religious belief and sexual orientation** for Inclusion purposes;
- **Criminal records history** – including whether you have any unspent criminal convictions or further information if the role requires a DBS check; and
- **Health details** – including whether or not you consider yourself to have a disability or impairment for which the organisation needs to make reasonable adjustments during the recruitment process.

We will only use your sensitive data in the following ways and based on the following lawful basis:

- To consider whether we need to provide appropriate disability adjustments during the recruitment process, to comply with our legal obligations as an employer and where it is needed in the public interest (such as equal opportunities monitoring) and
- We will use information about your race or national or ethnic origin, religious beliefs to ensure meaningful Inclusion monitoring and report.

Where we collect this data from

Yarlington collects this data from a variety of sources including through the application process, CVs, from identity documents such as passports or collected through assessments such as interviews.

Yarlington may also collect personal data about you from third parties such as recruitment partners/agencies, former employers/referees. Yarlington will only seek references once a job offer has been made.

Where we will store this data

Data will be stored in a range of secure places which include the following:

- Your application records
- Yarlington's HR systems
- Other IT systems

How long will we hold your data

We will only retain your information for as long as is necessary to fulfil the purposes set out in the Privacy Notice.

Interview and assessment records for unsuccessful applicants will be retained for a period of one year after the vacancy has closed.

Records for successful applicants will be transferred to their personal file and a separate privacy notice will then apply for any employee.

Your candidate account will be deactivated after 12 months of inactivity. You can deactivate your account at any time. At the same time as this, your data will be fully anonymised.

Why we need this data

Yarlington needs to process the types of data listed for a variety of purposes for which we have a 'lawful basis'. This data enables Yarlington to:

- Assess your skills, qualification and suitability to the role you have applied for;
- Communicate with you during the recruitment process;
- Keep records of our hiring processes;
- Carry out our obligations and exercise specific rights in relation to employment including carrying out statistical analysis; and
- To comply with our legal obligations such as to prevent fraud.

Yarlington will comply with data protection law. We will ensure the data we hold about you will be:

- Used lawfully, fairly and transparently;
- Collected only for, and relevant to the purposes explained to you;
- Accurate and kept up to date;
- Kept only for as long as required; and
- Kept securely.

Who we share your data with & why

Your data will be shared internally for the purposes of the fair and legally compliant recruitment process outlined. This includes sharing data with HR, our recruitment partners, managers involved in the recruitment process, and IT staff if access to the data is necessary for the performance of their roles.

Yarlington will not share your data with third parties unless your application is successful and results in an offer of employment. The organisation will then share your data with former employers/nominated referees in order to obtain references. In addition, we verify data with the Disclosure and Barring Service to obtain necessary criminal records checks where appropriate for the role.

Networx and Yarlington will not share data with third parties for secondary or unrelated purposes unless otherwise disclosed at the point of collection and not without having gained acceptance at the point of collection.

How will we secure your data?

Yarlington takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused

or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Networkx have in place reasonable commercial standards of technology and operational security along with internal policies and procedures to protect all data provided by visitors and applicants from loss, misuse, alteration or destruction.

Your rights and how you can access the data we hold about you

Networkx are dedicated to providing reasonable access to visitors who wish to review the personal data retained when they apply via the website and correct any inaccuracies it may contain. Visitors who choose to register may access their profile, correct and update their details, or withdraw their details at any time by accessing their personal profile by using their secure login. In all cases, Networkx will treat requests to access data or change data in accordance with applicable legal requirements.

You have the following rights in relation to the way your personal data is handled:

- the right of erasure or to be forgotten
- the right to rectification if data is inaccurate or out of date
- the right of data portability (to obtain and reuse your personal data)
- the right to object to Networkx and the Controller and processors handling of your personal data
- the right to withdraw your consent with regards to the handling of your personal data
- you have the right to ask for a copy of the data we hold about you (Subject Access Request)
- You have the right to lodge a complaint with a supervisory authority - the ICO

Within your Networkx account, you can also use the Download Data feature to generate an XML file of the current data held on you that you have provided and/or have access to within the account.

Where you exercise your right to object or withdraw your consent we may process your personal data without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so. In such a case, we will not process more personal data than is required under the circumstances.

If you are not satisfied by Networkx's actions, you can seek recourse through the internal complaints procedure. If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner (www.ico.org.uk).

What if you do not provide personal data?

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

Changes to our Privacy Policy

We reserve the right to modify or amend this privacy statement at any time and for any reason, providing it maintains compliance with the General Data Protection Regulation (EU) 2016/679).

If you would like to exercise any of your rights, you can contact our Data Protection Officer at GDPR@yhg.co.uk

If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner (www.ico.org.uk).

By ticking the box and continuing with your application, you are agreeing to the terms in this privacy