

# Job Applicant Privacy Notice

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## Job Applicant Privacy Notice

### Data controller: Wales & West Utilities Ltd

As part of any recruitment process, the organisation collects and processes personal data relating to job applicants. Wales & West Utilities Limited (**WWU**) is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information does WWU collect?

WWU collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of 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;
- information about your entitlement to work in the UK;
- information collected following a drug and alcohol test; and
- equal opportunities monitoring information.

The organisation may collect this information in a variety of ways. For example, data might be contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

WWU may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

### Where is the information stored?

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

WWU do not routinely transfer and store data outside the European Economic Area (**EEA**) however we do use providers that transfer data to their subsidiaries outside the

EEA in certain circumstances, but we do have adequate protections and contractual provisions in place.

### **Why does WWU process personal data?**

WWU needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, WWU 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 organisation 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 WWU to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

WWU may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information create about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. WWU processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles WWU is obliged to seek information about criminal convictions and offences. Where WWU 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.

The organisation will not use your data for any purpose other than the recruitment exercise for which you have applied, unless you are successful, in which case your data will be retained in accordance with our employee privacy notice.

### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in 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.

WWU will not share your data with third parties unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks, expert providers in drug and alcohol testing and the Disclosure and Barring Service to obtain necessary criminal records checks.

## How does WWU protect data?

WWU 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.

## For how long does WWU keep data?

If your application for employment is unsuccessful, the organisation will hold your data on file for one year after the end of the relevant recruitment process.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained in accordance with our staff privacy notice.

## Your rights

As a data subject, you have a number of rights. You have the right to:

- request access and obtain a copy of your data on request;
- ask WWU to change incorrect or incomplete data;
- ask WWU to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on your consent or WWU's legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact the HR department or Data Protection Officer ([dataprotection@wwutilities.co.uk](mailto:dataprotection@wwutilities.co.uk)). Please note that not all of these rights apply to all information, and so we may not be able to comply with your request. We will always tell you if this is the case.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner: [www.ico.org.uk](http://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, the organisation may not be able to process your application properly or at all.