



## JOB APPLICANT PRIVACY NOTICE

PUBLIC

Data Controller: Bulletproof Cyber, Units H, J & K Gateway 1000, Whittle Way, Stevenage, Herts, SG1 2FP. 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 data 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 ((EU) 2016/679) (GDPR).

As part of our candidate application and recruitment process, Bulletproof Cyber collects, processes and stores personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

### **Data protection principles**

We will comply with data protection law and principles, which means that your data 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 might we collect?**

In connection with your application to work with us, we will collect, store, and use the following categories of personal information about you. Here are some examples of the type of information we may collect:

- Personal details such as name, address and contact details (including email address and telephone number) and date of birth
- Details of your education, qualifications, skills, experience and employment history
- Information about your current level of remuneration, including benefit entitlements;
- Employer feedback/references
- Information about your entitlement to work in the UK (e.g. passport, driving licence, NI numbers);
- Photographs and images from onsite CCTV
- Results of employment screening checks
- Assessment results
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process

### **How is your personal information collected?**

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

We 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. Other than for the purposes of skills testing which is conducted by a third party during the assessment process, we will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

### **How and why we will use the information about you?**

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

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

We use the information about you where we have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process in order to manage our job applications. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide whom to offer a job.

In some cases, we need to process data 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 before employment starts. We may also need to process data from job applicants to respond to and defend against legal claims.

We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability.

### **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### **Information about criminal convictions and reference checks**

Where a job applicant is offered a role with us, we will need to process data prior to entering into a contract of employment. We conduct reference checks and basic criminal record checks on all successful job applicants. We process this information to carry out our obligations and exercise specific rights in relation to employment. This allows us to meet our regulatory compliance obligations and is

of particular importance given the sensitive and confidential nature of the data we hold and the systems we manage for our customers across our businesses.

**What if you are unsuccessful?**

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

**Automated decision making**

Recruitment processes at Bulletproof Cyber are not based solely on automated decision-making.

**Who has access to this data?**

We will need to share this data internally for the purposes of managing our recruitment exercise. Here are some examples of the type of people who may have access to the data:

- Members of HR who have responsibility for the relevant HR processes
- Interviewers involved in the recruitment process
- Managers in the business area with a vacancy or those acting on their behalf
- Any employees with responsibility for investigating issues of non-compliance with laws and regulations, policies and contractual requirements
- IT staff who manage user access and staff who manage office premises
- Third party companies who provide test and assessment services to us

The data shared is limited to what is required by each individual to perform their role in the recruitment process. Other than for the purposes of conducting tests as part of our recruitment process, for which your consent will be obtained prior, we will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment.

If you are offered a job with us, we will then share your data with former employers to obtain references for you. We will also ask you to provide your personal data to the Disclosure and Barring Service for the purposes of obtaining a basic criminal record check which lists “unspent” criminal convictions. We will ask you to provide this criminal record information to our HR Manager and this will only be shared, if necessary, with staff responsible in considering unspent criminal convictions and its relevance with the role which you have applied for.

**Data Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

We will not transfer your data outside the European Economic Area.

### Data retention

If your application for employment is unsuccessful, we will hold your data on file for 12 months following the relevant recruitment process. If you agree, we may hold your data on file for a further 12 months for consideration for further employment opportunities. At the end of that period or once you withdraw your consent, your data will be deleted or destroyed.

Any data submitted to third party job boards will be held in accordance with the relevant third party's data processing policies and procedures. If you would like us to delete any personal data processed via a third-party job board, please contact the HR Manager at Bulletproof Cyber (Jodi.Weston@serverchoice.com).

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 the employee privacy notice.

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- **Request erasure** of your personal information. This enables you to ask us to delete or remove 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 processing** of your personal information where we are relying on a legitimate interest (or those of a third party) 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
- **Request the transfer** of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR Manager in writing (Jodi.Weston@serverchoice.com).

**Right to withdraw consent**

When you apply for a role, you provide consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the HR Manager at Bulletproof (Jodi.Weston@ServerChoice.com). Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

**Data Protection Officer**

We have appointed a data protection officer (DPO) 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 DPO (dpo@bulletproof.co.uk). 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.

**Right to Make a Complaint**

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact Jodi Weston via email (Jodi.weston@serverchoice.com) Alternatively, you can make a complaint to the Information Commissioner's Office:

By Post: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By Website: Click Here <https://ico.org.uk/>

By Phone: 0303 123 1113 (Local rate) or 01625 545 745 (National rate)



T: 01438 532 900

E: [contact@bulletproof.co.uk](mailto:contact@bulletproof.co.uk)

W: [www.bulletproof.co.uk](http://www.bulletproof.co.uk)

© Copyright 2018 Bulletproof

All rights reserved