

## **Job Application Privacy Notice**

As part of any recruitment process, RWG collects and processes personal data relating to job applicants. RWG is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

RWG are a 'data controller'. That means we are responsible for deciding how we hold and use personal information about you. We are required under Data Protection legislation to notify you of the information contained within this notice.

In complying with data protection law, we are obliged ensure that the data we hold on you must 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 these purposes;
- Accurate and kept up to date;
- Kept only for long as necessary for the purposes we have told you about;
- Kept securely.

It is important that you read this notice so that you are aware of how and why we use such information.

### **What information does RWG collect?**

RWG 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 RWG needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- information about any criminal convictions you may have.

RWG collects this information 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.

RWG will 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. RWG 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.

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).

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

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

In some cases, RWG 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.

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

Where RWG relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

RWG processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

RWG is obliged to seek information about criminal convictions and offences. Where RWG seeks this information, it does so because it is necessary for the Company to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, RWG will keep your personal data on file for a period of six months in case there are future employment opportunities for which you may be suited. RWG 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 will 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.

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

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

### **How does RWG protect data?**

RWG 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 RWG keep data?**

If your application for employment is unsuccessful, RWG will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period, or once you withdraw your consent, 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.

## **Your rights**

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

- access and obtain a copy of your data on request;
- require RWG to change incorrect or incomplete data;
- require RWG to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where RWG is relying on its legitimate interests as the legal ground for processing;
- ask RWG to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override RWG's legitimate grounds for processing data; and

in the limited circumstances where you may have provided consent to the collection, processing and/or transfer of your personal information for a specific purpose you have the right to withdraw your consent for the specific processing at any time. To withdraw your consent, please use the contact details below. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purposes you originally agreed to, unless we have another legitimate interest for doing so in law. If you would like to exercise any of these rights, please contact Debbie Slessor at [hr@rwgroup.com](mailto:hr@rwgroup.com). You can make a subject access request by completing RWG's subject access form.

If you believe that RWG has not complied with your data protection rights, you can complain to the Information Commissioner.

## **What if you do not provide personal data?**

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