



# Fair Data Processing Notice (Recruitment)

CYBER SECURITY  
RISK MANAGEMENT  
BUSINESS INTELLIGENCE

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## 1 Purpose

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S-RM is committed to protecting privacy and security of personal data of all of its recruitment candidates.

This privacy notice describes how we collect and use the personal information we collect about you throughout the recruitment process, in accordance with the Data Protection Legislation.

This notice applies to all candidates.

S-RM reserves the right to update this notice at any time.

## 2 Background

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S-RM is a 'data controller', meaning that it is responsible for deciding how we hold and use personal information about you.

S-RM is registered with the Information Commissioner's Office ("ICO"). The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

This notice sets out the basis on which any personal data we may collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Should you have any questions about this Privacy Notice or how we process your data, please contact [compliance@s-rminform.com](mailto:compliance@s-rminform.com).

## 3 Data Protection Principles

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Throughout the recruitment process, we will process your personal data in compliance 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.

## 4 The information we hold about you

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Personal data means any information about an individual from which that person can be identified. The legislation also creates 'special categories' of more sensitive personal data which require a higher level of protection.

S-RM will collect, store and use the following categories of personal information about you in connection with your application:

- The information you have provided to us in your curriculum vitae and covering letter including:
  - o Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
  - o Date of birth;
  - o Gender;
  - o Employment history,
  - o Qualification,
  
- Any information you provide to us during an interview.

We may also collect, store and use the following 'special categories' of more sensitive personal information:

- o Information about your race or ethnicity;
- o Information about criminal convictions and offences, where applicable.

## 5 How we collect the information

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We collect personal information about candidates from the following sources:

- You, the candidate.
- Background check provider, from which we collect the following categories of data:
  - o Employment history
  - o Education history
  - o Current address and address history
  - o Unspent convictions
- Disclosure and Barring Service in respect of criminal convictions:
  - o Unspent Convictions
- The following data from third parties is from a publicly available source, such as LinkedIn:
  - o Employment history
  - o Contact details

## 6 How we will use the information we hold about you

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

- Assess your skills, qualifications and suitability for the role;
- Carry out background and reference checks, where applicable;
- Communicate with you the recruitment processes;
- Comply with our legal or regulatory requirements.

It is in our legitimate interest to decide whether to appoint you to the role. We also need to process your personal information to decide whether to enter into a contract of employment with you should your application be successful.

Having received your CV and covering letter we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will then invite you for the first round of interviews which might be followed by a second round of interviews and, depending on the requirements of the position you have applied for, a writing test. We will use that information to decide whether you meet the requirements for the role. If we decide to offer you the position, we will then take up references and carry out a background check before coming to your appointment.

**IF YOU FAIL TO PROVIDE PERSONAL INFORMATION**

If you fail to provide the requested information, which is necessary for us to consider your application, we will not be able to process your application successfully and offer you the employment.

## 7 How we use particularly sensitive personal information

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The sensitive data we may collect about you would have been provided by you at the point of your application. This may include the following categories of data:

- race or ethnicity;
- political beliefs
- religious beliefs
- trade union membership
- criminal convictions and offences, where applicable.

This data will not be used during your recruitment process

**INFORMATION ABOUT CRIMINAL CONVICTIONS**

It is our policy to carry out a basic criminal data base search (a “DBS”) on all new staff. A more enhanced check will be done if the position you have applied for is of a legal or financial nature.. We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal history which makes you unsuitable for the role..

We have in place an appropriate policy documents and safeguards which we are required by law to maintain when processing such data.

## 8 Data Sharing

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We will share your personal information only with the following parties for the purpose of processing your application:

- Sterling Backcheck – Background check provider
- Sage People – HRIS provider

All our 3<sup>rd</sup> party services providers and other entities in the group are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow 3<sup>rd</sup> party services providers to use your data for their own purposes or for purposes that are incompatible with that for which the data was initially collected. All of our 3<sup>rd</sup> party services providers are under contractual obligations to process your data only for specific purpose as defined by us and only in accordance with our instructions.

**DATA SECURITY**

We have put in place adequate measures to protect your data from being accidentally lost, used or accessed in an unauthorised way. In addition, we limit access to your personal information only to individuals who need to know that data for the recruitment process. Any 3<sup>rd</sup> parties that access your data will only process it in accordance with our instructions and subject to strict duty of confidentiality.

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

## 9 Data Retention

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We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for and for a maximum of six months following communication of the outcome of the recruitment process to you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against any candidates on prohibited grounds and that we have conducted the recruitment process in a fair and transparent manner. After this period, we will securely destroy your information in accordance with our Data Retention Policy. We will, however, keep a record of the fact that you applied for a position with us (this will be your name only) and the stage that your application reached for a period of two years.

## 10 Your Rights

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Data Protection Legislation awards the data subject a number of rights. By law, you have a right to:

- Request access to your personal information,
- Request correction of incomplete or inaccurate data that we hold about you.
- Request erasure of your personal data when there is no further reason for us to store that information.
- Object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation, which makes you want to object to processing on this ground.
- Request a restriction of processing of your personal information when you want to establish its accuracy or the reason for processing.
- Request a transfer of your personal data to another party.

If you want to exercise any of the above specified rights, please contact [compliance@s-rminform.com](mailto:compliance@s-rminform.com). You are usually not required to pay a fee for access to your information (or exercising any of the other rights). However, in cases where your request is clearly unfounded or excessive, we may charge a reasonable fee or refuse to comply with your request. If you consider that our refusal to comply with your request is unreasonable, 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.

## 11 Changes to this Privacy Notice

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S-RM reserves the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.