

# Applicant Privacy Notice

This privacy notice explains what data is collected about you, and why, as an applicant for employment with the XPS Pensions Group plc.

## Who is the data controller?

A data controller is the person or organisation who determines what data to collect from you and how to use that data. A data controller is legally responsible for your data.

The data controller is your proposed employer, as set out in the advert for employment. This will be Xafinity Consulting Ltd.

The contact address is:

**Phoenix House, 1 Station Hill, Reading, RG1 1NB**

When we refer to 'we' and 'us' in this notice, we XPS Pensions Group as a prospective employer.

## What is the law?

The General Data Protection Regulation (GDPR) is the governing legislation for collecting and processing personal data.

As part of any recruitment process, we collect and process 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.

## What information do we collect?

We collect 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 we need to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK: and
- information about your religious beliefs (for Northern Ireland recruitment only).

We may collect 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, 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. 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.

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 do we process personal data?**

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

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 have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend legal claims.

We may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. Data that we use for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out our obligations and exercise specific rights in relation to employment.

For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

We will not use your data for any purpose other than the recruitment exercise for which you have applied for.

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

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy, IT staff and internal and external auditors, if access to the data is necessary for the performance of their role.

For the purposes of Graduate and Internship recruitment we use a third party applicant tracking system to manage the application and scheduling of interviews process. We may also use an external party to manage the overall Graduate/Internship recruitment process.

Other than the Graduate/Internship recruitment process we will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers, with your consent, 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.

We may also be legally required to provide your information to law enforcement agencies and regulators who have legal rights of access to your information.

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

### **How do we protect data?**

We take the security of your data seriously and have formal, documented Information Security and Data Protection policies that set out the security measures currently implemented and maintained. These core policies are supported by additional policies covering:

- Data retention
- Data encryption (using 256AES encryption)
- Physical security
- Data sharing and third party requests (including DWP, Police etc)
- Acceptable usage (e.g. email, internet facilities, telephone)

These policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties. You can ask for a copy of our policies at any time.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, under a duty of confidentiality and an obligation to implement appropriate technical and organisational measures to ensure the security of data.

### **How long do we keep data for?**

If your application for employment is unsuccessful, we will hold your data on file for 3 years after the end of the relevant recruitment process. At the end of that period or if you request that we do so, your data will be 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.

### **What are your rights?**

You have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us 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 we are relying on legitimate interests as the legal ground for processing - meaning we believe we have a good business reason for processing your data - please refer to page 2 of this document for a list of reasons where we would have a legitimate interest in processing your data.

The above rights are always subject to a right for us to keep your data so as to be able to defend any future legal claims.

If you would like to exercise any of these rights, please contact HR.

If you believe that we have 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 us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

### **Automated decision-making**

Some of our recruitment processes are based solely on automated decision-making. This applies where we use the applicant tracking system for our Graduate/Internship recruitment. This system automatically sifts candidates out of the process if they do not meet pre-determined qualification criteria.

### **Where can you get an up to date copy of this notice?**

We will ensure that a copy of all of our privacy notices are regularly updated and provided on our website.