

## Privacy Notice for job applicants

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### Introduction

As part of any recruitment process, Free Word collects and processes personal data relating to job applicants. Free Word is committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

### What information do we collect and how?

Free Word 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
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process, and
- information about your entitlement to work in the UK

We may collect this information in a variety of ways. For example, data might be provided directly by you to Free Word, contained in application forms, CVs, letters and emails, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Free Word 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.

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 need to process your personal data?

#### For contractual purposes:

Free Word 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.

#### Where we have a legal obligation:

In some cases, Free Word 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.

## **For our legitimate organisational interests:**

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

## **Special categories of data:**

We may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. Wherever possible this data will be anonymised. We may also collect information about whether or not applicants are disabled, to monitor recruitment statistics and to make reasonable adjustments for candidates who have a disability. Free Word processes such information to carry out our obligations and exercise specific rights in relation to employment.

Free Word is entitled to seek information about unspent criminal convictions and for some roles we are obliged to seek information about spent and unspent criminal convictions and offences. Where we seek this information, we do so because it is necessary for Free Word 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, unless you have entered into a different relationship with us, for example by joining our mailing list, buying a ticket or becoming an employee – in which case, a different Privacy Notice will apply and will be provided to you.

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

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team and interviewers involved in the recruitment process, and other members of staff if access to the data is necessary for the performance of their roles.

Third party IT support consultants may occasionally be given access to your data by Free Word if this is necessary for the performance of their roles. Otherwise, Free Word 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 and the Disclosure and Barring Service (DBS) to obtain necessary criminal records checks.

The personal information you provide may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if data backed up in cloud services are located in a country outside of the EEA

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your consent to the specific transfer. You will have the right to withdraw this consent at any time.

Please email us at [datalead@freewordcentre.com](mailto:datalead@freewordcentre.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Despite all our precautions, no data transmission over the internet is 100% secure.

## Security

We are committed to protecting the personal data you entrust to us. We adopt appropriate technologies and policies so that the information we have about you is protected from unauthorised access and improper use, e.g. our own network is protected.

## How long does Free Word keep your data?

If your application for employment is unsuccessful, Free Word will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period, 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 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 Free Word is relying on our legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please email: [datalead@freewordcentre.com](mailto:datalead@freewordcentre.com).

If you consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (ICO).

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

You are under no statutory or contractual obligation to provide data to Free Word 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**

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