

# Job applicant Privacy Notice

## Data Controller

Victoria Park City of Glasgow AC

## Data Protection Officer

Gordon Innes, Club Secretary

## Introduction

We have appointed Gordon Innes as the person with responsibility for data protection compliance within the company and their role is to inform and advise the company in relation to its data protection obligations]. Questions about this policy, or requests for further information, should be directed to them at [gordon@vp-glasgow.com](mailto:gordon@vp-glasgow.com) .

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;

We may collect this information in a variety of ways. For example, data might be collected through application forms, CVs, resumes, online portfolios or sites like LinkedIn; obtained from your passport or other identity documents such as your driving licence, 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 recruitment agencies, references supplied by former employers, information from employment background check providers and information from criminal records checks permitted by law, if deemed necessary. We will seek information from third parties only once a job offer to you has been made.

Data will be stored in a range of different places, including on your application record 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 against legal claims.

We may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out obligations and exercise specific rights in relation to employment.

We may process other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time by contacting us.

If your application is unsuccessful, we may keep your personal data on file in case there are future opportunities for which you may be suited. You are free to withdraw your consent at any time.

## Who has access to data?

Your information may be shared internally, including with HR, Finance, IT, Trustees, members of the Management team and general project teams, if access to the data is necessary for performance of their roles.

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 to obtain references for you and employment background check providers to obtain necessary background checks.

We will not transfer your data to countries outside the UK.

## How do we protect data?

We take the security of your data seriously. We have internal 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 proper performance of their duties. We have managed network share points, for example, to ensure HR and finance related data has restricted access, project data which contains elements of personal data also has restricted access.

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

### **For how long do we keep data?**

If your application for work is unsuccessful, we will hold your data on file 1 year after the end of the relevant recruitment process, for consideration for future work opportunities. We may contact you during this 1 year period to discuss new opportunities we believe you are suitable for. In this circumstance, the 1 year retention period will start over. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment/work 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 we are relying on legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Gordon Innes, Club Secretary.

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

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

### **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**

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