



Candidate Privacy Policy - Zachary Daniels Ltd. 15.05.2018

Data controller: Zachary Daniels Limited

Data protection officer: Danny Monfea

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

What information does Zachary Daniels Limited collect?

Zachary Daniels Limited collects a range of information about you. This may include:

- 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 **Zachary Daniels Limited** needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and

Zachary Daniels Limited 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 telephone registration calls, interviews or other forms of assessment.

Zachary Daniels Limited 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. **Zachary Daniels Limited** 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 our candidate management systems and on other IT systems (including email).

Why does Zachary Daniels Limited process personal data?

Zachary Daniels Limited 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.

In some cases, **Zachary Daniels Limited** 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.



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

Zachary Daniels Limited 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 its obligations and exercise specific rights in relation to employment.

Where **Zachary Daniels Limited** processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, **Zachary Daniels Limited** is obliged to seek information about criminal convictions and offences. Where **Zachary Daniels Limited** seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, **Zachary Daniels Limited** may keep your personal data on file in case there are future employment opportunities for which you may be suited. **Zachary Daniels Limited** will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time by contacting us.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the recruitment admin team, consultants 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.

Zachary Daniels Limited will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. **Zachary Daniels Limited** 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.

Zachary Daniels Limited will not transfer your data outside the European Economic Area.



How does Zachary Daniels Limited protect data?

Zachary Daniels Limited 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. Please feel free to request a copy of our internal data protection policy at any time.

For how long does Zachary Daniels Limited keep data?

If your application for employment is unsuccessful, **Zachary Daniels Limited** will hold your data on file for [time period] after the end of the relevant recruitment process. [If you agree to allow **Zachary Daniels Limited** to keep your personal data on file, **Zachary Daniels Limited** will hold your data on file for a further 2 years for consideration for future employment opportunities. At the end of that period or once you withdraw or re provide 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 **Zachary Daniels Limited** to change incorrect or incomplete data;
- require **Zachary Daniels Limited** 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 **Zachary Daniels Limited** is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Danny Monfea at danny@zacharydaniels.co.uk

If you believe that **Zachary Daniels Limited** 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 **Zachary Daniels Limited** during the recruitment process. However, if you do not provide the information, **Zachary Daniels Limited** 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 at Zachary Daniels Limited.

