



Data Privacy Notice for Employment Candidates

2018

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Introduction

We are Conversion Works Limited with registered number 08417758 and address Unit 6 Windsor Business Centre SL4 1SP. Our Data Protection Lead can be contacted at dataprotection@conversionworks.co.uk. We have produced this privacy notice in order to keep you informed of how we will handle your personal data as Data Controller. All handling of your personal data is done in compliance with the General Data Protection Regulation (EU) 2016/679 (“Data Protection Legislation”).

This notice will apply to any individual applying for a role within our business, either as an employee, contractor or worker (collectively referred to in this notice as “Candidates”).

As part of running the business, Conversion Works Limited will need to process the personal data of Candidates. We recognise the importance of data protection principles and will always comply with Data Protection Legislation.

The terms “Personal Data”, “Personal Data Breach”, “Data Protection Officer”, “Data Controller”, “Data Processor”, “Data Subject” and “process” (in the context of usage of Personal Data) shall have the meanings given to them in the Data Protection Legislation. “Data Protection Lead” is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer.

What are your rights?

When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- The right to be informed of how your Personal Data is used (through this notice);
- The right to access any personal data held about you;
- The right to rectify any inaccurate or incomplete personal data held about you;
- The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy;
- The right to prevent processing for direct marketing purposes, scientific/historical research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and

- The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

Under certain circumstances, some of your rights might not be available, or be limited by legal requirements, our interests or the interests of others.

Where do we get your personal data?

A lot of the information that we collect about you is gathered through the application/recruitment process, either directly from you, or through an employment agency. During this process, we also sometimes collect additional information from third parties, such as former employers as referees, academic referees and publicly accessible sources, such as LinkedIn.

What information about you do we collect?

We might collect, use, store and transfer different kinds of Personal Data about you which includes:

- the information found in your CV;
- the information included in your covering letter;
- the information you give us during interview; and
- information about your protected characteristics, as defined in the Equalities Act 2010.

How do we use the data we collect?

We use the data we collect about you to:

- assess skills, qualifications and suitability for the role;
- communicate with you about the recruitment process; and
- comply with legal and/or regulatory requirements.

It is within our legitimate interests to process your information in order to decide whether you offer you the role as it is beneficial to us to fill the role.

This processing will also help us determine whether we will enter into a contract with you.

Whether or not we collect or use certain data is determined by the recruitment

process as follows:

1. We will receive your CV and covering letter and/or test results and use this information to decide if you will be shortlisted for the role.
2. If you are called for interview, we will use the information gathered at this stage to decide if we will offer you the role or to progress onto another interview phase.
3. If you accept our offer, we will then conduct our final checks, such as gathering references and information about your right to work in the UK, before confirming your appointment.

If you fail to provide any of the information noted above, at the times requested, we will not be able to make an adequate decision on your suitability for the role available, and unfortunately, will need to remove you from consideration.

How do we use 'Special Categories' of personal data?

- We use information you provide us about any disabilities in order to make reasonable adjustments during the recruitment process, as required.
- We carry out equal opportunities monitoring and reporting by processing information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation.
- We do not expect to process any information about criminal convictions.

What profiling or automated decision making do we perform?

Conversion Works Limited does not perform any profiling or automated decision making based on your personal data.

How long will your personal data be kept?

Conversion Works Limited holds your details in relation to recruitment for a period of three (3) months after we have informed you of our final decision. We do this so that we can evidence our decision-making process in the event of any allegations of discrimination.

Where applicable, we might also be required to hold records for longer periods in order to comply with a legal obligation, such as the applications of foreign nationals that must be held by us for a minimum of twelve (12) months in compliance with Home Office regulations.

We might ask your consent to hold your details in order to recommend other roles within our organisation that we think you might be interested in. If we do, we will provide you with full details of how your data will be processed at the time we ask for consent.

Who else will receive your personal data?

Conversion Works Limited passes your data to the third parties identified in 'Our Data Processors' section below. We pass data to these third parties strictly for the purpose of helping us to process your application. Third parties are not permitted to use your data for their own purposes.

Our Data Processors

Name of Third Party Processor	Purposes for carrying out processing	Their Data Processors ('sub-processors')	If applicable – where does data leaving the EEA go and what safeguards are in place?
HSBC	Payments	https://www.hsbc.co.uk/1/PA_esf-ca-app-content/content/pws/content/personal/pdfs/your-information.pdf	Data may be transferred to and stored in locations outside the European Economic Area (EEA) https://www.hsbc.co.uk/1/PA_esf-ca-app-content/content/pws/content/personal/pdfs/your-information.pdf
HMRC	Monthly Payroll Submission	https://www.gov.uk/help/privacy-policy	No, all data is stored on secure servers in the European Economic Area (EEA). https://www.gov.uk/help/privacy-policy
Xero	Accounts/Payroll	https://www.xero.com/content/dam/xero/pdf/GDPR/Xero-Data-Processing-Addendum.pdf https://www.xero.com/uk/about/terms/privacy/	The data is being kept on Amazon Web Services. The Company Headquarters are located in New Zealand. https://www.xero.com/uk/about/security/ https://www.xero.com/uk/about/privacy/ https://www.xero.com/uk/campaigns/xero-and-gdpr/
Nest	Pension Provider	https://www.nestpensions.org.uk/schemeweb/nest/nestcorporation/privacy-policy/personal-information-members.html	IT Security - ISO 27001, data can be transferred outside the EEA. https://www.nestpensions.org.uk/schemeweb/nest/nestcorporation/privacy-policy/personal-information-members.html

AXA	Health Insurance Provider	https://www.axa.co.uk/privacy-policy/	Switzerland (European Data Centre), India (several administrative functions). https://www.axa.co.uk/privacy-policy/
HJS	Accounts / Payroll	http://www.hjsolutions.co.uk/accountants/service-terms/	Data may be transferred to and stored in locations outside the European Economic Area (EEA) http://www.hjsolutions.co.uk/accountants/service-terms/
Newland Chase	Work Permit / Visa	https://newlandchase.com/privacy/	In general for the customers located in the EU, the data is located only in the EU as per Newland Chase, Information Protection Program. Sub-processors data centres may locate around the world. https://newlandchase.com/privacy/
Google	Business needs	https://gsuite.google.com/intl/en/terms/subprocessors.html	Yes, the Data Centres located around the world https://www.google.com/about/datacenters/inside/locations/index.html
ISMS (Alliantist)	Business needs	https://www.isms.online/terms-conditions/	All customer data is hosted in the UK . Sub-processors' data centres may locate around the world https://www.isms.online/privacy/

Does your data leave the EU?

Yes. Details are included in the section 'Our Data Processors' above.

Who can you get in touch with?

If you'd like to discuss any of the points raised within this notice, please get in touch your recruitment contact or our Data Protection Lead at dataprotection@conversionworks.co.uk.

If you are not happy with how we have handled your Personal Data, in addition to sending us your complaints directly to dataprotection@conversionworks.co.uk, you can send complaints to our supervisory authority. As Conversion Works Limited predominantly handles the personal data of UK nationals, our supervisory authority is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting <https://ico.org.uk/concerns/>