

## RECRUITMENT PRIVACY NOTICE

### Objective

The objective of this Notice is to provide job applicants with information about how personal data will be used.

### Scope

This Notice applies to all external job applicants.

### Context

As part of our recruitment processes, Coulson Building Group collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use this data and to complying with our data protection obligations under the General Data Protection Regulation (GDPR).

### The information we collect

Coulson Building Group collects and processes a range of information during the recruitment process including:

- Your name, address and contact details, including email address and telephone numbers
- Details of your qualifications, training, skills, experience and employment history
- Information regarding your current and previous levels or remuneration including benefit entitlements
- Whether or not you have a disability for which the business needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK
- Whether you have any convictions, cautions, reprimands or final warnings that are not 'Protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended in 2013
- Driving records including endorsements

### How is this information collected

Coulson Building Group collects information in a variety of ways. For example, data might be contained in application forms, CVs, passports or other identity documents, or collected through interviews and other forms of assessment.

We may also gather personal data about you from third parties such as references provided by previous employers. We will only seek information from third parties in terms of criminal records checks once a job offer has been made and if applicable to the role.

### Where is information stored

Data will be stored in a range of different places including on a central recruitment record, IT systems, including email.

### Why do we process personal data

We need to process data for a number of reasons including taking necessary steps to make contact with you, and, if applicable, before entering into a contract with you.

In some cases, Coulson Building Group needs to process data to enable us to comply with a legal obligation. For example, the requirement to check someone's eligibility to work in the UK before employment starts.

Coulson Building Group has a legitimate interest in processing personal data during the recruitment process to enable us to assess a candidate's suitability for the role.

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

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

Your data may be shared internally for the purposes of the recruitment process. This includes members of the HR team, interviewers and managers in the business areas that the vacancy exists.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Where an offer is accepted, Coulson Building Group will share your data with third parties where there is a legitimate reason to do so including in order to obtain employment references and security screening from third parties such as the Disclosure and Barring Service (DBS).

The Company will not transfer your data to countries outside of the European Economic Area (EEA).

### **How does the business protect your data**

Coulson Building Group naturally takes the security of your data seriously. The Company has internal policies and controls in place to ensure that your data is stored securely and accessed only by its employees' in the performance of their duties.

### **How long is data held**

If your application for employment is unsuccessful, Coulson Building Group will hold your data on file for six months after the end of the relevant recruitment process. If you agree to allow Coulson Building Group to keep your personal information on file, we will hold your data on file for a further six months for consideration for future employment opportunities. At the end of that period, unless you withdraw your consent at an earlier stage, your data is deleted or destroyed.

If your application for employment is successful, the personal information gathered during the recruitment process will be transferred to your employee file and retained during your employment. A separate privacy notice will then be applicable which you will be made aware of.

### **Your rights**

As a data subject you have a number of rights including to:

- Obtain a copy or access your data on request
- Require the Company to change incorrect or incomplete data
- Request that data be deleted or processing of your data to be ceased, for example if you withdraw from the recruitment process.

If you have any questions or concerns, please contact the HR Department.

You also have the option to address any concerns relating to your data protection rights directly with the Information Commissioner's Office.

Natalie Firmin  
HR Manager