

# GDPR PRIVACY NOTICE FOR JOB APPLICANTS

May 2018 version

As part of any recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. The Data Controller for these purposes is the designated HR Manager, contactable at London Biggin Hill Airport, Main Passenger Terminal, Biggin Hill, Kent, TN16 3BH.

## **What information does the Company collect?**

The Company collects a range of information about you, including:

- 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 the Company needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The Company collects 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 interviews or other forms of assessment.

The Company will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from criminal records checks, DVSA, Home Office, DfT and other government bodies. The Company 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 does the Company process personal data?**

The Company needs to process data prior to entering into a contract with you.

In some cases, the Company 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.

The Company 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 Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

# GDPR PRIVACY NOTICE FOR JOB APPLICANTS

May 2018 version

The Company processes health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability.

Where the Company processes 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.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, we do so because it is necessary for us to carry out our obligations.

The Company will not use your data for any purpose other than the recruitment exercise for which you have applied without your written consent.

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

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers 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.

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. The Company will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks (including the DVSA) and the Disclosure and Barring Service to obtain necessary criminal records checks.

Your data may be transferred outside the European Economic Area (EEA) for necessary counter terrorist checks (CTC) and reference checks.

## **How does the Company protect data?**

The Company 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.

## **For how long does the Company keep data?**

If your application for employment is unsuccessful, the Company will hold your data on file for six 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 period for which your data will be held will be provided to you in a new privacy notice.

# GDPR PRIVACY NOTICE FOR JOB APPLICANTS

May 2018 version

## **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 the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the HR Manager.

If you believe that the Company 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 the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application.

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.