



Notice 2: Applicants Privacy Notice

Applicants: How your information will be used

Introduction

1. The ateb Group (including Mill Bay Homes and West Wales Care & Repair) to be known as “the Group” needs to keep and process information about you for normal recruitment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process. This includes using information to enable us to comply with any legal requirements, pursue the legitimate interests of the Group and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
2. We are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your application process with us, in accordance with the General Data Protection Regulation (EU 2016/679) (“**GDPR**”) and the related UK legislation, including the Data Protection Act 2018 (“**DPA**”).
3. Your data will only be processed if we have a lawful ground to do so. This includes using information to enable us to comply with our legal obligations, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
4. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the course of the recruitment process.

How your data will be processed

5. Application/data collection forms are produced by the ateb group who, as Data Controller, will collect and use your data for the purposes of considering you for suitable employment vacancies, communicating with you at various stages in the selection process (such as to arrange interviews), and for inducting successful applicants.

Types of information we collect and where it is collected from

6. The sort of information we hold includes:
 - a. your application form (which may include information such as contact details, gender, date of birth, employment history, title, qualifications and personal interests) and references
 - b. documentation relating to you, for example interview notes, training certificates and qualifications, ID documents e.g. passport
 - c. correspondence with or about you, for example interview invites, offer letters, references
 - d. any other information you provide to us during interviews
 - e. information needed for equal opportunities monitoring
7. Much of the information we hold will have been provided by you, but some may come from external sources, such as recruitment agencies, referees, or other companies in the ateb group, background check agencies, or the Disclosure and Barring Service (see below for information in relation to criminal convictions).
8. We may also obtain information about you which is publicly available, e.g. from your social media profiles, Google or previous employers' websites.

How we may use your information

9. We will use the personal information we collect about you to:
 - a. Assess your skills, qualifications, and suitability for the role.
 - b. Carry out background and reference checks, where applicable.
 - c. Communicate with you about the recruitment process.
 - d. Keep records related to our hiring processes.
 - e. Comply with legal or regulatory requirements.
10. It is in our legitimate interests to decide whether to appoint you to this role since it would be beneficial to our business to appoint someone to that role.
11. We also need to process your personal information to decide whether to enter into a contract of employment or engagement with you.
12. Having received your application form, we and/or the ateb group will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and depending on the nature of the post may carry out a criminal record **or other** relevant checks before confirming your appointment.

How we use particularly sensitive personal information

13. We will use your particularly sensitive personal information in the following ways:
 - a. We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.
 - b. We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

14. We may, depending on the role we are recruiting to, process information about criminal convictions.
15. If applicable we will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). For certain posts we are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.
16. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Data sharing

17. We may share your information with the following third parties:
 - a. As ateb group undertakes recruitment for ateb, Mill Bay Homes and West Wales Care & Repair, applications are sent directly to us will be shared with the Group for the purposes of the recruitment process.
 - b. We may share information with any recruitment agencies which are acting on your behalf.
 - c. We may share the information you have provided to us with your nominated referees for the purposes of verifying the details you have provided to us, whether this is from former employers, academic institutions or personal referees.
 - d. We may share information with the Disclosure and Barring Service during the course of obtaining criminal records checks, if applicable.
18. The ateb group and any third-party service providers we use are required to put in place measures to keep your data secure, and we do not consent to them processing your data other than for the purpose of the recruitment process.

Automated decision-making

19. Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. This is only permitted in limited circumstances. We do not envisage that any decisions will be taken about you using automated means; however, if this position changes, we will notify you of this in writing and let you know what your rights are in this area.

Data security

20. We will store the information you provide on a computer system provided by a specialist company who act in the capacity of our Data Processor and are based in the UK. We will store some information in hard copy format e.g.interview notes, ID documents, certificates.
21. We have in place appropriate physical and electronic security measures and policies to protect the security of your personal data. For further information on what these measures are, please contact our Data Protection Officer using the contact details at the end of this document.
22. We have procedures to deal with any suspected personal data breach and, in the event of a breach involving your personal data, will comply with our obligations under data protection law in relation to notifying you and the Information Commissioner's Office.

Data retention

23. We will retain your personal data for a retention period of six months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

Your rights

24. Under the GDPR and the DPA you have a number of rights with regard to your personal data. You have the right to:
 - a. **Request from us access to** your personal data (commonly known as a "data subject access request". This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - b. **Request correction** of your personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - c. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us

continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- d. **Object to processing** of your personal information where we are only relying on our own legitimate interests (or those of a third party) as our basis for doing so, and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object if we process your personal information for direct marketing purposes.
 - e. **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - f. **Request the transfer** of your personal information to another party.
25. If you wish to exercise or find out more about any of these rights, including if you wish to make a subject access request, you should contact our Data Protection Officer using the contact details set out at the end of this document. You will not have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances. We may also need to request specific information from you to help us confirm your identity and ensure your right to access the information. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
26. **Right to withdraw consent:** In the limited circumstances where you may have provided consent for the collection, processing and transfer of your data for specific purposes, you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
27. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Identity and contact details of controller and data protection officer

28. ateb Group Limited is the controller of data for the purposes of the DPA and GDPR.
29. If you would like to know anything further about how we handle information that we hold about or if you have any concerns as to how your data is processed you can contact our Data Protection Officer, Julie John via mydata@atebgroup.co.uk