



## **Job Applicant Privacy Notice**

IIGCC is aware of its obligations under the General Data Protection Regulation (GDPR) and current data protection legislation and is committed to processing your data securely and transparently. This privacy notice sets out, in line with data protection obligations, the types of data that we collect and hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

### **Data controller details**

IIGCC is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: IIGCC Ltd, 77 Kingsway, London WC2B 6SR, UK.

### **Data protection principles**

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

### **Types of data we process**

IIGCC collects a range of information about you. This includes:

- your personal details including your name, address, date of birth, email address, telephone numbers
- details of your qualifications, skills, experience and employment history
- whether or not you have a disability for which IIGCC needs to make reasonable adjustments during the recruitment process
- information about your eligibility to work in the UK and documentation relating to your right to work in the UK
- information about your current level of remuneration, if you choose to share this information with us



- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, disability and religion or belief.

### **How we collect your data**

IIGCC may collect this information in a variety of ways. For example, data might be contained in application forms, CVs / resumes, cover letters, obtained from your passport or other identity documents, collected through interviews or other forms of assessment, or sometimes from a third party such as a recruitment agency.

We may also review your public social media accounts for information relevant to the job, although this would usually only be later in the process (such as when you have been short-listed based on your experience and qualifications).

IIGCC will seek information from third parties only once a job offer has been made to you and will inform you that it is doing so. The only exception to this is if you are selected for interview and have provided IIGCC with your permission to contact your referees prior to a job offer being made then IIGCC will go ahead and contact your referees.

Data will be stored in a range of different places, including on your application record, in HR systems and on other IT systems (including email).

### **Why we process your data**

The law on data protection allows us to process your data for certain reasons. These are:

- in order to enter into or perform the employment contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

We need to collect your data to ensure we are complying with legal requirements such as:

- carrying out checks in relation to your right to work in the UK and
- making reasonable adjustments for disabled employees.

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.



We also collect data so that we can carry out activities which are in the legitimate interests of IIGCC. We have set these out below:

- making decisions about who to offer employment to
- making decisions about salary and other benefits
- assessing training needs
- ensuring compliance with individual statutory rights
- ensuring effective Human Resources management and business administration
- enabling us to establish, exercise or defend possible legal claims made against us

If you are unsuccessful in obtaining employment, your data will not be used for any reason other than in the ways explained in relation to the specific application you have made. We may seek your consent to retaining your data in case other suitable job vacancies arise in IIGCC for which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

We may use job application data to review our recruitment processes but any data used in this way will be anonymised and usually aggregated with other applicant information.

### **Special categories of data**

We may also collect special categories of data “sensitive data” relating to your race or ethnicity, religious beliefs, health and/ or sexual orientation in order to ensure meaningful equal opportunity monitoring and reporting. We ensure that this information is not used to make individual decisions about your recruitment.

We will seek your consent to allow us to process your sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

### **If you do not provide your data to us**

You are under no statutory or contractual obligation to provide data to IIGCC during the recruitment process. However, if you do not provide the information, IIGCC may not be able to process your application properly or at all.

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

The personal data that you submit via the application form on Monday.com will be stored securely on data servers located in the United States of America.



Your data will be shared with relevant employees within IIGCC where it is necessary for them to undertake their duties with regard to recruitment. This includes, for example, the HR and recruitment team, shortlisting and interview panel members involved in the recruitment process (this may include external panel members), other managers in the department with a vacancy (where appropriate), and IT service providers who facilitate the activities listed in this Privacy Notice.

IIGCC will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. As well as circulating your application and related materials to the appropriate employees at IIGCC, we will share your personal information for the above purposes as relevant and necessary with:

- your referees.
- UK Visas & Immigration (UKVI) in order to administer relevant recruitment checks and procedures.

Your data may be transferred outside the European Economic Area (EEA) in order to meet our contractual obligations with you (e.g. to conduct reference checks). Such transfers are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information.

## **Protecting your data**

IIGCC takes the security of your data seriously.

IIGCC takes appropriate technical, administrative, physical and procedural security measures, consistent with local and international information practices, to protect your personal information from misuse, unauthorised access or disclosure, loss, alteration, or destruction. Details of the measures which are in place can be obtained from Anthony Rigby ([arigby@iigcc.org](mailto:arigby@iigcc.org)). We will notify you and any applicable regulator of any suspected unauthorised use of your personal data.

## **How long we keep your data for**

In line with data protection principles, we only keep your data for as long as we need it for, and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for 6 months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for 12 months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.



If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems.

Anonymised data may be retained to allow IIGCC to undertake trend analysis. All remaining data will be anonymised so that it can no longer be traced back to an individual.

### **Automated decision making**

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

### **Your rights in relation to your data**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request
- require IIGCC to change incorrect or incomplete data
- require IIGCC 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 IIGCC is relying on its legitimate interests as the legal ground for processing.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you would like to exercise any of these rights, please contact Anthony Rigby ([arigby@iigcc.org](mailto:arigby@iigcc.org)). We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

### **Changes to this privacy notice**

IIGCC reserves the right to update or amend this privacy notice at any time. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.



## **Making a complaint**

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

## **How to contact us**

If you have any questions about this Privacy Notice or our handling of your personal information, please contact us by email at: [arigby@iigcc.org](mailto:arigby@iigcc.org) or by post at: 77 Kingsway, London WC2B 6SR, UK.