

Data protection privacy notice (recruitment)

This notice explains what personal data (personal information) we will hold about you, how we collect it, and how we will use and may share personal information during the application process. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the personal information

The Company is a 'data controller' and gathers and uses certain personal information about you.

Data protection principles

The data protection principles which we will apply when gathering and using personal information are set out in our Data Protection Policy. If you would like a copy of our Data Protection Policy, please contact our Data Protection Contact (Mandi Evans, Human Resources, on 07583 003691 or at mandi@whbond.co.uk).

About the personal information we collect and hold

A table summarising the personal information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared is attached to this notice as Part A.

A table summarising the additional personal information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared attached to this notice as Part B.

We seek to ensure that our personal information collection and processing is always proportionate. We will notify you of any changes to personal information we collect or to the purposes for which we collect and process it.

Where personal information may be held

Personal information may be held at our offices and third-party agencies, service providers, representatives and agents.

How long we keep your personal information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary. How long we keep your personal information will depend on whether your application is successful and you become employed by us, the nature of the personal information concerned and the purposes for which it is processed.

We will keep recruitment personal information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment personal information that is necessary in relation to your employment. For further information, see our Data Protection Policy.

Your rights to correct and access your personal information and to ask for it to be erased

Please contact our Data Protection Contact if (in accordance with applicable law) you would like to correct or request access to personal information that we hold or if you have any questions about this notice. You also have the right to ask our Data Protection Contact for some but not all of the personal information we hold and process to be erased (the ‘right to be forgotten’) in certain circumstances.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that our Data Protection Contact can resolve any query or concern you raise about our use of your personal information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Part A

Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (i.e. address, home and mobile phone numbers and email address)	From you	Legitimate interest: to carry out a fair recruitment process (‘FRP’) Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel or the personnel in the relevant department (‘Relevant Personnel’) to contact you to progress your application, arrange interviews and inform you of the outcome To inform the Relevant Personnel of your application
Details of your qualifications, experience and employment history (including job titles, salary and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: FRP Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed shortlisting and (if relevant) recruitment decision Shared with Relevant Personnel
Information regarding your criminal record	From you, in your completed application form	Legitimate interests: to ensure that the business’ interests are safeguarded	To make an informed shortlisting and (if relevant) recruitment decision Information shared with

		For reasons of substantial public interest (preventing or detecting unlawful acts)	Relevant Personnel, professional advisers and other regulatory authorities as required*
Details of your referees	From your completed application form	Legitimate interest: FRP	FRP Information shared with Relevant Personnel and the referee

Part B

Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/>	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit ('IDR') Legitimate interests: to maintain employment records and to comply with good employment practice	To obtain the relevant reference about you Information shared with Relevant Personnel and the referee
Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	IDR May be shared with Relevant Personnel, professional advisers and academic or professional institutions to carry out background checks
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	PTC To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with Relevant Personnel, professional advisers and the Home Office
A copy of your driving licence if required by your role <input type="checkbox"/>	From you or the DLVA portal	PTC To comply with	IDR To ensure that you have a

		our legal obligations To comply with the terms of our insurance	clean driving licence Information may be shared with Relevant Personnel, our insurer and any penalties/banning check provider
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You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information are set out in our Data Protection Policy