

## **JOB APPLICANT PRIVACY POLICY**

Psychological Consultancy Ltd. is a “data controller”. This means we are required under the UK data protection legislation to notify you of how we will collect process and store your personal data during the application and recruitment process. We will also explain what rights you have in relation to how we process your personal data.

### **What personal data will we collect, use and store about you?**

To process your job application, we will collect the following information about you:

- 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.
- Information about your entitlement to work in the UK.
- Assessment interview, psychometric test results.
- Pre-employment screening.

We may also collect, store, and use the following “special categories” of more sensitive personal information:

- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process.

### **How do we collect your personal data?**

We will collect this information from a range of sources, which will include your application form, CV, your passport or other identity documents, or information provided directly by you through interviews or other forms of assessment.

Psychological Consultancy Limited will also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

### **Unsolicited CV's**

If we receive an unsolicited cv at a time when we are not recruiting, we will delete the cv and inform you of this. if we want to hold this unsolicited personal data on file for future recruitment rounds, we will inform you of this in a privacy notice, along with the other required information.

### **Lawful basis for processing your personal information**

We consider that the basis for which we will process the data contained in the list above (see section above - details of information we will hold about you) is to enable us to consider whether we may wish to enter into a contract or agreement with you and to enable us to comply with our legal obligations.

The circumstances in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment
- Making decisions about salary and other benefits
- Checking you are legally entitled to work in the UK
- Assessing qualifications for a particular job or task.
- Education, training, and development requirements.

- Complying with health and safety obligations
- There may be more than one reason to validate the reason for processing your personal information.

### What happens if you do not provide us with information?

We will only ask you to provide information which we believe is necessary for the application and recruitment process. You are under no statutory or contractual obligation to provide data during the recruitment process. However, if you do not provide sufficient information, we may not be able to process your application properly or at all. Also, we may not be able to meet our legal obligations towards you regarding reasonable adjustments.

### What happens if we need to use your personal data for a new purpose?

We have indicated above a list of circumstances in which we will use your data. We will usually only use your personal data as indicated. However, if we consider that it is necessary and reasonable to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

### Lawful basis for processing “special categories” of sensitive data

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We may process special categories of personal information in the following circumstances:

- **consent:** You have given clear consent for us to process your personal data for a specific purpose.
- **contract:** The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract.
- **legal obligation:** The processing is necessary for us to comply with the law (not including contractual obligations) and meets the obligations under our data protection policy.
- **vital interests:** the processing is necessary to protect someone’s life.
- **public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law. and meets the obligations under our data protection policy. (For example, in the case of equal opportunities monitoring)
- **legitimate interests:** the processing is necessary for our legitimate interests unless there is a good reason to protect your personal data which overrides those legitimate interests. (For example, to assess your capacity to work on the grounds of ill health)

Occasionally, special categories of data may be processed where you are not capable of giving your consent, where you have already made the information public or in the course of legitimate business activities or legal obligations and in line with the appropriate safeguards.

Examples of the circumstances in which we will process special categories of your particularly sensitive personal information are listed below (this list is non-exhaustive):

- To protect your health and safety in the workplace.
- To assess your physical or emotional fitness to work.
- To determine if reasonable adjustments are needed or are in place.
- To fulfil equal opportunity monitoring or reporting obligations if applicable.

Where appropriate, we may seek your written authorisation to process special categories of data. Upon such an occasion we will endeavour to provide full and clear reasons at that time for you to make an informed decision. In any situation where consent is sought, please be advised that you are under no contractual obligation to comply with a request. Should you decline to consent you will not suffer a detriment.

### Criminal convictions

Given the nature of the role and duties you will perform we WILL NOT request and hold information about criminal convictions.

### **Automated decision making**

During the application and recruitment process we will not rely on any automated decision making.

### **Data Security**

As part of our commitment to protecting the security of any data we process, we continue to monitor and review our policies. In addition, we have put further security measures in place to avoid data from being accessed, damaged, interfered with, lost, damaged, stolen or compromised. In cases of a breach, or suspected breach, of data security you will be informed, as will any appropriate regulator, in accordance with our legal obligations.

Any data that is shared with third parties is restricted to those who have a business need, in accordance with our guidance and in accordance with the duty of confidentiality.

We will share your data with:

- former employers to obtain references for you.
- employment background check providers to obtain necessary background checks.
- Psychometric assessment sub-processor.

Your information will be shared internally for the purposes of the recruitment exercise. This includes:

- Interviewers involved in the recruitment process.
- IT administrators.

### **Will we transfer your personal data outside of the UK?**

If you are asked to complete a Hogan psychometric assessment as part of the interview assessment process, then your personal data will be transferred outside of the UK to the US. We have relevant safeguards in place, such as Standard Contractual Clauses with Hogan Assessments Systems.

### **How do we ensure your personal data is secure?**

We take your privacy and protection of data very seriously. Consequently, we have put in place appropriate security measures to prevent unauthorised use of your personal data. We will notify you and any applicable regulator of any suspected unauthorised use of your personal data.

### **How long will we keep your personal data?**

We will retain your personal data for as long as is necessary to fulfil the purposes for which it was collected for.

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process.

If you agree we will keep your personal data on file, for a further 6 months for consideration for future employment opportunities.

At the end of that period or once you withdraw your consent your data will be 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 periods for which your data will be held will be available in our data retention policy.

### How will we store your data?

Your data will be stored in a number of different places, including on your application record, in your personnel file and on IT systems (including email).

### Your duty to inform us of any changes

In order that we can ensure that the personal data we hold in relation to you is accurate, it is important that you keep us informed of any changes to that data.

### What rights do you have in respect of how we use your personal data?

Subject to legal limitations you have the right to:

- **Request access to your data:** You can ask us to provide a copy of the personal data we hold about you.
- **Request corrections to be made to your data:** If you think that your personal data is incomplete, inaccurate you can ask us to correct it.
- **Request erasure of your data:** If you consider there is no lawful basis for us to continue processing your data you can ask for that data to be deleted or removed.
- **Object to the processing of your data:** If our lawful basis for processing your data relates to a legitimate business interest (or third-party interest) you can raise an objection to that interest. You can also object to us using your information for direct marketing purposes.
- **Request that processing restrictions be put in place:** If you believe that your information is being processed without a lawful reason or that the information is incorrect you can request that a freeze/restricting is placed on the processing of the information until your concerns are addressed.
- **Request a transfer of your personal data:** You can ask us to transfer your personal data to a third party.

If you wish to exercise any of the above rights, please contact [info@psychological-consultancy.com](mailto:info@psychological-consultancy.com)

### Before we comply with your request

Whenever you make a request for access to personal data, to ensure that we are releasing personal data to the correct person we may ask questions to confirm your identity.

### Right to withdraw your consent

If we have asked for your written consent to obtain information, you have the right to withdraw your consent at any time. To withdraw your consent please contact [info@psychological-consultancy.com](mailto:info@psychological-consultancy.com) Once we receive your notice of withdrawal, we will cease processing your data unless we have any other lawful basis on which to continue processing that data.

### How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact us [info@psychological-consultancy.com](mailto:info@psychological-consultancy.com) If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/>