



## **BPL Job Applicant Privacy Notice**

As part of its recruitment process, BPL collect and process personal identification information (PII) relating to its job applicants. We are committed to being transparent about how we collect and use your PII and to meeting our data protection obligations.

### **What information does BPL collect?**

BPL collects and processes PII relating to you that includes:

- 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 you have a disability for which we need to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK
- Outcome of any assessment that is performed during the recruitment process
- Notes and test results from recruitment processes (including interview and assessment centre notes)
- Basic disclosure information (where applicable)

We collect this information in a variety of ways using data which is provided in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews and other forms of assessment. BPL may also collect PII about you from third parties, such as information supplied by employment background check providers who will contact former employers, qualifications providers and, in some instances, the Disclosure and Barring Service. BPL will also collect information from its chosen Occupational Health provider. We will only seek information from third parties once a job offer has been made to you and we will inform you that we are doing so.

Your PII will be stored within related business systems including on your application record, HR management systems and related IT systems including email.

### **Why does BPL process personal data?**

We need to process data to conduct our recruitment and selection process prior to entering into a contract with you. In some cases, we need to process data to ensure that we are complying with our legal obligations, for example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

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

Where BPL relies on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of employees (and prospective employees) and we have concluded that they are not.

We process health information to allow us to make reasonable adjustments to the recruitment process for you if you have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.

For some roles, BPL is obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to comply with a regulatory requirement to establish whether an individual has committed an unlawful act or been involved in dishonesty or other improper conduct.

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

Your information will be shared internally for the purposes of our recruitment and selection process. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and the IT team if access to your data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. BPL will then share your data with its chosen employment background check providers, former employers and where applicable, the Disclosure and Barring Service to obtain necessary background checks for you. BPL will also share your data with its chosen Occupational Health provider.

It may be necessary as part of the processing of your application for BPL to engage with third parties within the European Economic Area. We apply 'due-diligence' to the use of all third parties to ensure PII is correctly processed and controlled to the same high standards as within BPL.

## **How does BPL protect data?**

BPL applies technical and procedural practices to the security of all data. Internal policies, procedures and controls ensure your data is not lost, accidentally destroyed, misused or disclosed, and not accessed for non-legitimate purposes.

## **How long does BPL keep data?**

If your application for employment is unsuccessful, BPL will hold your data on file for 12 months after the end of the relevant recruitment process for future employment opportunities. At the end of the 12-month period, or if you withdraw your consent sooner, 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 provided to you in a new privacy notice.

## **What are your rights on Data**

Under new government legislation, you have the following rights to PII:

- To be informed on what data is held by BPL
- To access (via a 'Subject Access Request') a copy of data held
- To correct data held
- To erase the data held (only applicable when no statutory or regulatory requirement exists for us to retain data)
- To be informed where data breaches may have occurred
- The transfer of data by your consent to a third party outside of BPL
- To pause the legitimate processing of data (only applicable when no statutory or regulatory requirement exists for BPL to process data)
- To pause automated decisions and profiling of data.

To exercise any of the above rights, a formal request must be submitted to BPL. You can make a subject access request by completing BPL's subject access request form, which can be provided by the BPL recruitment team.

If you believe that BPL has not complied with your data protection rights, you can complain to the Information Commissioner.

## **What if you choose not to provide personal data?**

BPL applies the principles of minimisation to PII which means that we only collect data that is necessary to perform legitimate statutory and regulatory requirements. You are under no obligation to provide data to BPL during the recruitment process. However, if you do not provide the information, BPL may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence subject to any statutory obligations or contractual obligations set by BPL.