



## Privacy Notice (Job Applicants)

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### Introduction

The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR), effective from 25th May 2018.

As part of any recruitment process, HTA collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. 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.

### Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy (recruitment statement).

### What information does HTA collect?

HTA collects and processes a range of information about job applicants, including:

- 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 or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK, your nationality and immigration status;
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief;
- Details of your referees.

HTA collects this information in a variety of ways. We collect the data from you, our referees, your education provider and the Home Office. For example, data might be contained within CVs or Portfolios, obtained from your passport, or collected through interviews or other forms of assessment.

HTA 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 request your permission before doing so.



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

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

The Company needs to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you. In some cases, HTA needs to process data to ensure we comply with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company 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. HTA may also need to process data from job applicants to respond to and defend against legal claims.

Where we rely 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 or workers and have concluded that they are not.

HTA processes health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.

Where HTA processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes and your express consent will be requested.

If your application is unsuccessful, the Company will keep your personal data on file for 6 months after the end of the relevant recruitment process. If the Company requires to keep your information for longer you will be asked for your consent. You are free to withdraw your consent at any time.

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

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the Human Resources and recruitment teams, interviewers involved in the recruitment process, managers in the business area with a vacancy, and IT staff if access to the data is necessary for the performance of their roles.

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

HTA will not transfer your data outside the European Economic Area (EEA).



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### How does HTA protect data?

HTA takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by the relevant employees of the Company in the proper performance of their duties.

Job applications received via email or via our online Applicant Tracking System (ATS) within our GDPR compliant PeopleHR database are held securely and only made available to the appropriate employees to perform their duties, for example HR and/or the hiring manager's. If an email is deleted it is held for 30 days on the server before it is purged from the system. We also regularly backup our mailboxes.

All data access is strictly controlled.

### How long does HTA keep your data?

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. 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 are outlined within HTA's **Data Retention Policy** and **Internal Privacy Notice**.

### Your rights

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

- Request access to your data;
- Require the Company to change incorrect or incomplete data;
- Ask the Company to delete or stop processing some but not all of your data in certain circumstances;

If you would like to exercise any of these rights, please contact Stephanie Warner, HR Manager via email at: [Stephanie.Warner@hta.co.uk](mailto:Stephanie.Warner@hta.co.uk)

### 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 information will do so only in an authorised manner and are subject to a duty of confidentiality.



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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 HR Manager or Data Protection Lead can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](https://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

### Automated decision-making

Recruitment processes are not based solely on automated decision-making.