

PFEIFER Integrated Procedures Manual		
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Job Application Privacy Notice

In accordance with the General Data Protection Regulation (GDPR), Pfeifer Drako Ltd of Marshfield Bank, Crewe, Cheshire, CW2 8UY has implemented this privacy notice to inform you, as prospective employees of our Organisation, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

Data protection principles

In accordance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- processing is fair, lawful and transparent
- data is collected for specific, explicit and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date
- data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- we comply with the relevant GDPR procedures for international transferring of personal data.

Types of data held

Personal data is any information about an individual from which that person can be identified. It does not include anonymous data which does not identify the individual.

We collect, store and use several categories of personal data on our prospective employees to carry out effective and efficient processes. We keep this data in recruitment files relating to each vacancy and we also hold the data within our computer systems, e.g. recruitment logs. It is your responsibility to keep us up to date with any changes to your personal details so that we can make sure that your personal data is accurate. If your personal details change, you must notify the HR Department.

We may collect, store and process the following categories of personal data about applicants:

- personal details such as name, address, telephone number, email address and date of birth;
- recruitment information including CVs, application forms, covering letters, interview notes and assessment results;
- employment history, qualifications, skills, training and professional memberships;
- references from previous employers or other referees;
- right to work documentation and proof of identity;
- driving licence information where relevant to the role;

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The Integrated Procedures manual is a controlled document and care must be exercised when using hard (printed) copies of the manual as these may not be the most up to date versions. Always destroy hard copies immediately after use.

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- equal opportunities monitoring information, including race, religion, disability status, gender and other diversity information where voluntarily provided;
- information relating to any disability or health condition where necessary to make reasonable adjustments during the recruitment process;
- criminal conviction information where relevant to the role and permitted by law; and
- records of communications relating to your application.

Collecting your data

You provide several pieces of data to us directly during the recruitment exercise.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Should you be successful in your job application, we will gather further information from you, e.g. your bank details and next of kin details, once your employment begins.

Lawful basis for processing

The law on data protection allows us to process your data for certain reasons only.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled applicants or employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment, e.g. promotion	Legitimate interests - to assess suitability for employment, select the most suitable candidate, manage recruitment processes and workforce planning.
Making decisions about salary and other benefits	Legitimate interests - to determine appropriate remuneration and benefits based on qualifications, skills, experience and business requirements.
Making decisions about contractual benefits to provide to you	Legitimate interests - to administer employee benefits and ensure employees receive the benefits to which they are entitled.
Assessing training needs	Legitimate interests - to identify training requirements, support employee development and ensure employees have the skills and competencies required for their role.
Dealing with legal claims made against us	Legitimate interests - to establish, exercise or defend legal claims and protect the Company's legal rights and interests.

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Preventing fraud	Legitimate interests - to protect the Company, its employees, customers and assets from fraud, dishonesty and unlawful activity.
Verifying qualifications, employment history and references	Legitimate interests - to verify information provided during the recruitment process and assess suitability for employment.

Where special category personal data is processed (for example, information relating to health, disability, race, religion or other diversity data), the Company relies on the additional conditions set out in Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018, where applicable.

Special categories of data

You provide several pieces of data to us directly during the recruitment exercise.

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We carry out processing activities using special category data:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments.

Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

Failure to provide data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering a contract of employment with you. This could include being unable to offer you employment or administer contractual benefits.

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Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of the role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during employment where required. We use criminal conviction data to determine an individual's suitability, or continued suitability, for a role and to comply with legal, regulatory, customer or insurance requirements where applicable. We rely on the lawful basis of compliance with a legal obligation and/or our legitimate interests in assessing suitability for employment and protecting the business, its employees, customers and assets to process this data.

The Company does not normally obtain, process or retain criminal conviction data unless it is necessary for a specific role, legal obligation, customer requirement, regulatory requirement, insurance purpose or legal claim.

Who we share your data with

Employees within the Company who have responsibility for recruitment and selection will have access to your personal data where it is relevant to their role. All such employees are required to maintain the confidentiality and security of your personal data.

We may share your personal data with third parties where necessary to:

- verify your right to work in the UK;
- obtain employment references;
- verify qualifications and professional memberships;
- carry out pre-employment checks where relevant to the role;
- provide recruitment and HR administration services.

The third parties who may process your personal data for these purposes include:

- former employers and referees;
- professional bodies and qualification providers;
- government agencies and regulatory authorities where required by law;
- recruitment agencies (where applicable);
- providers of recruitment, HR and applicant management systems.

We may share your personal data with third parties where necessary to administer and manage the recruitment process. This may include the Company's HR systems and technology providers where applicant information is processed for recruitment administration, communication and record-keeping purposes.

We may also share your personal data with third parties as part of a business sale, merger, reorganisation or other corporate transaction, or where we are required to do so in order to comply with a legal or regulatory obligation.

We have appropriate contractual arrangements in place with third-party service providers to ensure your personal data is protected. Such providers are required to implement suitable technical and organisational measures to safeguard your information and may only process it in accordance with our instructions and applicable data protection legislation.

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We do not normally transfer applicant personal data outside the UK or the European Economic Area (EEA). Where such a transfer is necessary, appropriate safeguards will be implemented in accordance with UK data protection legislation to ensure your personal data remains protected.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Retention Periods

We will retain your personal data throughout the recruitment process and only for as long as necessary for the purposes for which it was collected.

If your application is unsuccessful and you have not consented to us retaining your details for future opportunities, we will retain your personal data for six months after the recruitment process has ended. This enables us to respond to any queries, complaints or legal claims arising from the recruitment process.

Where you have provided consent for us to retain your details for future employment opportunities, we will retain your personal data for up to 12 months after the recruitment process has ended. At the end of this period, your personal data will be securely deleted or destroyed unless you withdraw your consent before that date.

Where you have provided consent for us to process your personal data, you have the right to withdraw that consent at any time. If you withdraw your consent, we will stop processing your data for that purpose and securely delete or destroy it where appropriate.

If your application is successful, the personal data collected during the recruitment process will become part of your employee record and will be transferred to the Company's employee management systems. You will be provided with the Company's Employee Privacy Notice, which explains how your personal data will be processed during your employment.

Further information regarding retention periods is available in the Company's Record Retention Schedule.

Automated decision making

Automated decision-making means making decisions about you using no human involvement, eg using computerised filtering equipment. No decision will be made about you solely based on 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

You have the following rights in relation to the personal data we hold on you:

- the right to be informed about the data we hold on you and what we do with it
- the right of access to the data we hold on you. We operate a separate Subject Access Request Policy and all such requests will be dealt with accordingly
- the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected

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("rectification")

- the right to have data deleted in certain circumstances ("erasure")
- the right to restrict the processing of the data
- the right to transfer the data we hold on you to another party ("portability")
- the right to object to the inclusion of any information
- the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data 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 wish to exercise any of the rights explained above, please contact the HR Department, HR@pfeifer.uk

Making a complaint

If you consider your data rights have been breached, you can make a complaint to us at any time using any of the following methods:

If you have any questions or concerns about how your personal data is being used by us, you can contact the HR Manager, details below

- email: HR@pfeifer.uk
- post: Pfeifer Drako Ltd, Marshfield Bank, Crewe, Cheshire, CW2 8UY
- telephone: 01270 587728

Further information about how to raise a data protection complaint is available in the Company's Data Protection Complaints Policy. A copy is available from the HR Department.

You also have the right to make a complaint to the Information Commissioner's Office (ICO) at any time.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

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

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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.

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.

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