

## CANDIDATE PRIVACY NOTICE

Harpenden Building Society (the Society, We, Us) is a "controller" in relation to your personal data. This means that we are responsible for deciding how we hold and use personal data about you. This Candidate Privacy Notice is in relation to you applying for a role with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and for how long it will usually be retained. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

### DATA PROTECTION PRINCIPLES

We will always comply with data protection law and principles, which means that your personal data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### YOUR PERSONAL DATA

In connection with your application to work with us, we will collect, store, and use the following categories of personal data about you:

- The data you (or your recruitment agency) have provided to us in your curriculum vitae and covering letter.
- Any data you provide to us during an interview.
- Any adverse material on social media or other websites.
- Documentary evidence of your right to work in the UK

We may also collect, store and use the following types of more sensitive personal data:

- Data about your race or ethnicity, religious beliefs, and sexual orientation. This is collated anonymously through an online questionnaire and is used to demonstrate our approach to equal opportunities.

Data about your health, including any medical condition which is used to enable us to meet your health needs at interview

## HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data about candidates from the following sources:

You, the candidate, from which we will collect the following categories of data

- Curriculum Vitae and covering letter.
- ID, address verification and right to work in the UK documents, such as passport driving licence, birth certificate, bank statements etc.
- Evidence of qualifications.

Recruitment agencies, from which we collect the following categories of data:

- Curriculum Vitae .
- Name, Address, Telephone Number, Email address.

## HOW WE PROCESS YOUR PERSONAL DATA

We will use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

Once we receive your CV and other material, we will then process that data to decide whether to shortlist you for the role. If we do, we may invite you for an interview. Data you provide to us at the interview will help us to decide whether to offer you the role. If we decide to offer you the role, it will be conditional on pre-employment checks, including criminal records checks, being satisfactory.

## IF YOU FAIL TO PROVIDE YOUR DATA

If you fail to provide data when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## YOUR SENSITIVE PERSONAL DATA

We will use your particularly sensitive personal data in the following ways:

- We will use data about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.
- We will use data about your race or nationality or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

## AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## DATA SHARING

During the recruitment process, we do not anticipate sharing data with any third party, other than to check your qualifications and work history, check criminal records and credit checking services, your references, and any recruitment agency that has contacted us on your behalf. If we need to share your personal data with any other third party we will contact you to discuss.

## DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a defined need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer (DPO). We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## DATA RETENTION

We will retain your personal data for a maximum period of twelve months after we have communicated to you our decision about whether to appoint you to the role. This is because we may wish to contact if a further opportunity has arisen.

We will retain your personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have recruited in a fair and transparent way. After this period, we will securely destroy your personal data in accordance with our data retention policy and applicable laws and regulations.

## YOUR RIGHTS OVER YOUR PERSONAL DATA

Under certain circumstances, by law you have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.

**Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the DPO. We will respond to your request within 30 days, and where we are by law unable to complete your request in full, we will explain this to you.

## DATA PROTECTION OFFICER (DPO)

We have appointed a Data Protection Officer (DPO) to oversee compliance with this Candidate Privacy Notice. If you have any questions about how we handle your personal data, please contact the DPO at [dpo@harpendenbs.co.uk](mailto:dpo@harpendenbs.co.uk), or by writing to:

The Data Protection Officer  
Harpenden Building Society  
Mardall House  
9-11 Vaughan Road  
Harpenden  
Hertfordshire AL5 4HU

You can also make a complaint to the Information Commissioner's Office at: [ico.org.uk](http://ico.org.uk).

Harpenden Building Society is authorised for investments by Trustees and is a member of the Building Societies Association. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Firm reference number: 157260

Telephone calls are recorded and may be monitored for regulatory and training purposes to help maintain service quality.

Head Office: Harpenden Building Society, Mardall House, 9-11 Vaughan Road, Harpenden AL5 4HU  
Tel: 01582 765411 Fax: 01582 462673

End.