

# DATA PROTECTION CANDIDATE PRIVACY NOTICE

## 1. PRIVACY NOTICE

This Candidate Privacy Notice describes how Harpenden Building Society (the Society, us, we) will deal with your personal data when you apply to work with us as an employee, temporary worker, contractor, or consultant.

We act as a controller of your personal data as we decide why and how to process it. This privacy notice sets out our responsibilities as a controller, and the rights that you retain over your personal data.

If you are successful in your application to work with us, we will provide you with a Colleague Privacy Notice that will supersede this one.

Our privacy notices are addressed to those customers subject to the GDPR in the UK and EU only, unless stated otherwise, and may be updated from time to time so please check this website for updates.

This privacy notice is provided electronically on our website and is circulated to applicants as part of the application process. A copy can also be requested by contacting us by phone, or letter, or email, or in person at any branch.

## 2. 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.

### 3. YOUR PERSONAL DATA

In connection with your application we will use the following categories of personal data:

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

### 4. HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data about candidates from the following sources:

From you:

- 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, and
- Evidence of qualifications.

From recruitment agencies:

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

### 5. HOW WE PROCESS YOUR PERSONAL DATA

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

- Communicate with you about the recruitment process.
- Assess your skills, qualifications, and suitability for the role.

- Carry out background and reference checks, where applicable.
- 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 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.

## 6. IF YOU FAIL TO PROVIDE YOUR DATA

If you fail to provide data 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.

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.

## 7. YOUR SENSITIVE PERSONAL DATA

We will process your sensitive personal data in the following ways:

- We will use any 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 also 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.

## 8. OUR LAWFUL BASES FOR PROCESSING

Data protection laws require us to explain which legal bases justify our processing of your personal data. If the legal bases change after we have collected your

personal data, where required by law, we will inform you about this and explain the need for any change.

The legal bases for our processing your personal data are:

- To prepare to perform an employment, contracting, or consulting contract with you.
- To comply with the law.
- To protect your vital interests.
- For a substantial public interest.
- With your consent, or
- For our legitimate interests such as to manage the day-to-day activities of the Society, to monitor access to our website, carrying out surveys, or analysing data for market research purposes.

## 9. AUTOMATED DECISION-MAKING

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

## 10. PROCESSING PERSONAL DATA BY THIRD PARTIES

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.

To manage the application process, we may need to use specialist companies that process your personal data. Categories of specialist companies include those that provide:

- IT hosting.
- Document storage.
- Communications.
- Printing.
- Financial Crime screening, and
- Credit scoring.

To comply with the law, we may also need to share your personal data with third parties, including:

- Lawyers.
- Dispute resolution bodies.
- Courts.
- Law enforcement agencies.
- Government agencies.
- Regulators, and
- Auditors.

If you would like further information on the recipients of your personal data, please contact the DPO at [privacy@harpendenbs.co.uk](mailto:privacy@harpendenbs.co.uk).

Where personal data is processed in the European Economic Area (EEA) (the EU plus Norway, Iceland, and Liechtenstein), it is legally protected as if it remained in the UK.

Some companies operate outside the EEA but do so from countries that the UK recognises has equivalent protections over personal data as under the GDPR (including Switzerland, Israel, Japan, and New Zealand).

Companies based in other countries that do not provide equivalent protections to the GDPR, such as the United States, can only process your personal data under strict controls including standard contract clauses, due diligence checks, and an assessment of the potential risk of disclosure of personal data.

When working with companies and/or transferring personal data to countries outside the UK, we take appropriate steps to ensure that there are adequate protections in place and that data protection legislation is followed.

If you would like more information about overseas transfers, please contact us.

## 11. 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.

## 12. 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.

## 13. YOUR DATA PROTECTION RIGHTS

You have data protection rights over your personal data, and you can exercise these rights at any time. You can do this by contacting us by email, phone or through your local branch.

Once you ask us to exercise your data protection rights, we may need to request specific information from you to confirm your identity and to clarify which rights you wish to exercise.

We try to respond to all requests within one month but if we believe that this may take longer, we will inform you.

You will not have to pay a fee to exercise your data protection rights, but we may need to charge a reasonable fee if your request is clearly unfounded or excessive.

Your data protection rights are:

- The right to be informed about processing.
- The right of access to your personal data.
- The right to rectify your personal data.
- The right to object to processing of your personal data.
- The right to restrict processing of your personal data.
- The right to have your personal data deleted (the right to be forgotten).
- The right to obtain a copy of your personal data, and
- The right to object to automated decision-making.

#### 14. HOW TO EXERCISE YOUR RIGHTS

To exercise your data protection rights, or to find out more details on how we process your personal data, please contact us by email, phone or through your local branch. Alternatively write to:

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

Or email [privacy@harpendenbs.co.uk](mailto:privacy@harpendenbs.co.uk).

If you are not happy with our handling of your personal data or our response to your exercise of your rights, you also have the right to complain to the Information Commissioner's Office by visiting [ico.org.uk](http://ico.org.uk).

End.