

Sedulo Privacy Policy

# Job Applicants Privacy Notice.

As part of any recruitment process, Sedulo collects and processes personal data relating to job applicants.

Sedulo is committed to being transparent about how we collect and use that data and to meeting our data protection obligations. For any GDPR related questions or access requests, please contact our assigned Data Controller, Keith Knight using gdpr@sedulo.co.uk.

## WHAT INFORMATION DOES SEDULO COLLECT?

Sedulo collects a range of information about you. This 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 or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.
- Information about your entitlement to work in the UK.
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.
- We collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents or collected through interviews or other forms of assessment.

Sedulo will also collect personal data about you from third parties, such as references supplied by former employers. We will seek to gain information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in various places, including on your application record, in HR management systems and on other IT systems (including email).

## WHY DOES SEDULO PROCESS PERSONAL DATA?

We need 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, Sedulo needs to process data to ensure that 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.

Sedulo 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 Sedulo to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide who will be a

offered a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Where Sedulo 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 team members and has concluded that they are not.

Sedulo processes health information if it needs 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.

If your application is unsuccessful, Sedulo will keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time.

#### WHO HAS ACCESS TO DATA?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the People and Culture Team, 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 will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. Sedulo will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Sedulo will not transfer your data outside the European Economic Area.

## **HOW DOES THE ORGANISATION PROTECT DATA?**

Sedulo 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 team members in the proper performance of their duties.

Data is safely secured with limited access given to required staff. No individuals outside of Sedulo are given access to our systems

# FOR HOW LONG DOES SEDULO KEEP DATA?

If your application for employment is unsuccessful, Sedulo will hold your data on file for 1 year after the end of the relevant recruitment process. If you agree to allow Sedulo to keep your personal data on file, we will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is 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.

## **YOUR RIGHTS**

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

- Access and obtain a copy of your data upon request.
- Require Sedulo to change incorrect or incomplete data.
- Require Sedulo to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.
- Object to the processing of your data where Sedulo is relying on its legitimate interests as the legal ground for processing.
- Ask Sedulo to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Sedulo's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact our Data Protection Officer, Keith Knight, by emailing gdpr@sedulo.co.uk.

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

## WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?

You are under no statutory or contractual obligation to provide data to Sedulo during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

## **AUTOMATED DECISION-MAKING**

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

## **CONTACT DETAILS**

If you need to contact us for any reason regarding your data, our details are:

ADDRESS	CONTACT NUMBER	EMAIL ADDRESS
Sedulo Ltd	0333 222 444 5	gdpr@sedulo.co.uk
62-66 Deansgate		
Manchester		
M3 2EN		

Please title any post and/or email "In relation to GDPR" to ensure it is passed to the correct person. Emails or calls made to other Sedulo employees outside of these methods may not promptly reach the Data Controller to issue a response.

the induction process.