



Fulwell 73 Limited

Privacy Notice (Recruitment)

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 when you apply for a job with us (which includes registering your interests with us) and during the application process. We are required to provide you with certain information under data protection legislation. Please ensure that you read this privacy notice and any other similar notice we may provide to you from time to time when we collect or process personal data about you.

Who collects information about you?

Fulwell 73 Limited ('**Fulwell 73**') is a 'data controller'. This means that we are responsible for deciding how we hold and use certain information about you.

Data protection principles

We will comply with data protection law and principles, which means that your 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.

The kind of information we hold about you

1. We may collect the following information up to and including the shortlisting stage of the recruitment process:
 - Your name and contact details (i.e. address, home and mobile phone numbers, email address);
 - Details of your qualifications, experience, employment history (including job titles, salary and working hours)
 - Details of your referees;
 - Any other information you have provided to us in your CV and covering letter.
2. We may collect the following information after shortlisting stage, and before making a final decision to recruit:



- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications (if relevant);
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- A copy of your driving licence.

How is your personal information collected?

We may collect information about applicants and job candidates from the following sources:

- You, the applicant.
- Recruitment agencies, from which we collect the following categories of data: CV and Cover Letter

How we will use information about you

- We will use the information 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 (e.g. our obligation to check that you are eligible to work in the United Kingdom).

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV and covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role you are applying for, or to consider whether we have any suitable roles for you when you register your interest with us. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references[, carry out a criminal record check or any other check (including a right to work check)] before confirming your appointment.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.



If you fail to provide personal information

If you fail to provide information 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 references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

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

We will use information 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 information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We do not envisage that we will process information about criminal convictions.

Automated decision-making

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

Why might you share my personal information with third parties?

We may need to share some of your information with other parties, such as HR consultants and professional advisers. We will only share your information with such parties for the purposes of processing your application. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be required to take appropriate security measures to protect your information in line with our policies and will also be bound by confidentiality obligations. We do not allow our third-party service providers to use your information for their own purposes. We only permit them to process your information for specified purposes and in accordance with our instructions.

We may also be required to share some personal information as required to comply with the law.



Keeping your personal information secure

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where information may be held

Information may be held at our offices and those of any third-party agencies, services providers, representatives and agents as described above.

How long we keep your personal information

We will keep the information we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. This will be explained further in our Employee Privacy Notice.

Where you register your interest with us by sending a speculative CV and covering letter to us, we will keep your information for 12 months from the date of receipt, on the basis that a further opportunity may arise in future and we may wish to consider you for that. If we wish to retain your personal information on file for a longer period, we will write to you separately seeking your consent to retain your personal information for a further fixed period on that basis.

Your rights in connection with your personal information

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



1. **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
4. **Object to processing** of your personal information 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 information for direct marketing purposes.
5. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact *our Head of HR* in writing at privacy@fulwell73.com.

Who to contact with queries or if you have a complaint

Our *Head of HR* is responsible for overseeing compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the *Head of HR* at privacy@fulwell73.com. We hope that any query or concern you raise about our use of your information can be resolved but if not, you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. See <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.