

Job Applicant Privacy Notice

Data Controller/Data Protection Officer: Kate Curran, Group Director of Finance, Governance & Investment

As part of any recruitment process, Barcud collects and processes personal data relating to job applicants. Barcud is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does Barcud collect?

Barcud 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;
- information about any criminal convictions;
- whether you have a disability for which Barcud needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

Barcud collects 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.

Barcud will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, including DVLA drivers licence checks and the Disclosure and Barring Service check to obtain necessary criminal records checks. Barcud will seek information from third parties only once a job offer to you has been made.

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

Why does Barcud process personal data?

Barcud needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, Barcud needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

Barcud 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 Barcud to manage the recruitment process, assess and confirm a candidate's suitability for

employment and decide to whom to offer a job. Barcud may also need to process data from job applicants to respond to and defend against legal claims.

Where Barcud relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of job applicants, employees or workers and has concluded that they are not.

Barcud 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 its obligations and exercise specific rights in relation to employment.

Where Barcud processes other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time by contacting the HR department.

For some roles, Barcud is obliged to seek information about criminal convictions and offences. Where Barcud seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment/it to comply with a regulatory requirement to establish whether an individual has committed an unlawful act or been involved in dishonesty or other improper conduct/the purposes of preventing or detecting unlawful acts.

Barcud will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to the data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment 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.

Barcud will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Barcud will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks, DVLA Driver's licence checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Barcud will not transfer your data outside the UK.

How does Barcud protect data?

Barcud 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 our employees in the proper performance of their duties. Internal Policies such as the Data Protection Policy and Information & Communication Technology Security policy, ensures that internal controls are in place.

For how long does Barcud keep data?

If your application for employment is unsuccessful, Barcud will hold your data on file for 6 months after the end of the relevant recruitment process. 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 on request;
- require Barcud to change incorrect or incomplete data;
- require Barcud 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 Barcud is relying on its legitimate interests as the legal ground for processing; and
- ask Barcud to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override Barcud's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Data Controller, Barcud, Unit 4, Pont Steffan Business Park, Lampeter Ceredigion, SA48 7HH.

If you believe that Barcud 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 Barcud during the recruitment process. However, if you do not provide the information, Barcud may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

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

We may use limited automated tools (including AI-based systems) to assist in managing applications, for example, to identify relevant skills or experience. Final decisions are always made by a human reviewer. You have the right to request human review of any decision that involves automated processing.