

**JOB APPLICANT PRIVACY NOTICE (GDPR COMPLIANT)
JANUARY 2019**

The Company is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

Data controller details

The Company is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: Grunberg & Co. Limited, 5 Technology Park, Colindale, London, NW9 6BX.

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

Types of data we process

We hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers
- your photograph
- gender
- marital status
- whether or not you have a disability.
- application forms, covering letters, and similar documents
- information included on your CV including references, education history and employment history
- documentation relating to your right to work in the UK
- driving licence or passport
- training details
- CCTV footage if you are invited to attend our office/s.
- building entry records, if you are invited to attend our office/s.

How we collect your data

We collect data about you in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you directly. This includes the information you would normally include in a CV or a recruitment cover letter, or notes made by our recruiting officers during a recruitment interview. Further information will be collected directly from you when you complete forms at the start of your employment/engagement, for example, your bank and next of kin details. Other details may be collected directly from you in

the form of official documentation such as your driving licence, passport or other right to work evidence.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Personal data is kept in personnel files or within the Company's HR and IT systems.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the employment contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest
- where we have obtained your consent.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

We need to collect your data to ensure we are complying with legal requirements such as:

- carry out checks in relation to your right to work in the UK and
- making reasonable adjustments for disabled employees.

We also collect data so that we can carry out activities which are in the legitimate interests of the Company. We have set these out below:

- making decisions about who to offer initial employment/engagement to
- making decisions about salary and other benefits
- providing contractual benefits to you
- assessing training needs
- dealing with legal claims made against us
- preventing fraud
- ensuring our administrative and IT systems are secure and robust against unauthorised access.

Special categories of data

Special categories of data are data relating to your:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health

- sexual orientation.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data in the following ways:

- Accountancy Professionals
To ensure you are fit and proper in line with the code of practice of professional bodies that the firm are members of and are obligated to adhere to and professional bodies that staff are members of in order to carry out their accounting and audit duties.

We process this data because of our legal obligation to the various accounting and tax bodies which we are ruled under to carry out accounting and tax work.

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with (as appropriate), your application.

Sharing your data

Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties with regard to recruitment. This includes, for example, the HR Manager, those in the department where the vacancy is who are responsible for screening your application and interviewing you, the IT department where you require access to our systems to undertake any assessments requiring IT equipment.

In some cases, we will collect data about you from third parties, such as employment agencies.

Your data will be shared with third parties if you are successful in your job application. In these circumstances, we will share your data in order to obtain references as part of the recruitment process and/or to obtain a criminal records check.

We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We follow appropriate security procedures in the collection, storage and use of your information so as to prevent unauthorised access by third parties.

We process data at our offices at our Colindale and London addresses, with access restrictions in place and at the sites of our data processors within the UK. Our IT specialist retains our data at a different location equally protected behind the appropriate firewalls and other security devices.

We have put in place commercially reasonable and 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 business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

We may, at times, transfer the personal data we collect about you outside of the EEA in order to perform our contract with you. There is an adequacy decision by the European Commission in relation to these countries therefore they will be deemed to provide an adequate level of protection for your personal information for the purpose of the Data Protection Legislation.

We have put in place measures to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the Data Protection Legislation.

However, unfortunately, the transmission of Information via the Internet is not completely secure. We cannot ensure the security of your Information transmitted by you to us via the internet. Any such transmission is at your own risk and you acknowledge and agree that we shall not be responsible for any unauthorised use, distribution, damage or destruction of your Information, except to the extent we are required to accept such responsibility by the GDPR, The Privacy and Electronic Communications Regulations or the Data Protection Act. Once we have received your Information we will use security procedures and features to prevent unauthorised access to it.

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with GDPR requirements. Third parties must

implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for, and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for six months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for 12 months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request.
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests

- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in a way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Robert Bean, as the data controller at Grunberg & Co. Ltd, 5 Technology Park, Colindeep Lane, Colindale, London, NW9 6BX.

Making a complaint

In the event that you wish to make a complaint about how your personal data is being processed by Grunberg & Co, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Grunberg & Co's data protection representatives Head of Privacy.

The details for each of these contacts are:

	Supervisory authority contact details	Head of Privacy
Contact Name:	Information Commissioners Office	Robert Bean
Address line 1:	Wycliffe House	Grunberg & Co. Ltd
Address line 2:	Water Lane	5 Technology Park
Address line 3:	Wilmslow	Colindeep Lane
Address line 4:	Cheshire	Colindale, London
Address line 5:	SK9 5AF	NW9 6BX
Email:		robertb@grunberg.co.uk
Telephone:	0303 123 1113	020 8458 0083

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