

THB Group Ltd – Job Applicant Privacy Notice

As part of our recruitment process we collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. This factsheet outlines the information we collect, why we collect it, how we use it, who will have access to it, how long we will keep it and your rights.

What information do we collect?

We collect a range of information about you. This includes but is not limited to:

- 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 we need 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, it may be contained in an application form or on a CV, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Once a job offer has been made to you we may also collect personal data about you from third parties, such as references supplied by former employers, information from our employment background check provider Credence and information from criminal records checks. We will of course inform you that we are doing so.

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

Why do we process personal data?

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

We may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment law.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

Some of our roles require us to seek information about criminal convictions and offences. Where this is the case, it is because we deem it necessary in order for us to ensure that the people we employ are fit and proper from both a regulatory (FCA) and client point of view.

If your application is unsuccessful, we may 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 my data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy, Finance 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. We will then share your data with former employers to obtain references for you, our employment background check provider Credence to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

We will not transfer your data outside the European Economic Area unless your application employment is successful and we make and you accept our offer of employment. Your data may then be transferred outside the European Economic Area (EEA) but only to territories that the European Commission has recognised as providing [adequate protection](#).

How does the organisation protect my data?

We take the security of your data seriously. We have 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.

For how long does the organisation keep my data?

If your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. At the end of that period or once you withdraw your consent, your data will be deleted.

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 can be found in the HR Data Retention Policy; a copy of which is available upon request.

What are my rights?

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

- Access and obtain a copy of your data on request;
- Require us to change incorrect or incomplete data;
- Require we delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and

- Object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact:

HR Department
THB Group Ltd
107 Leadenhall Street
London EC3A 4AF
Email: HR@thbgroup.com
Telephone: 0207 469 0100

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

What if I do not wish to provide personal data?

You are under no statutory or contractual obligation to provide data to us 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.

Are any decision-making processes automated?

Our recruitment processes are not based solely on automated decision-making.

