

# Privacy Notice for Job Applicants

Nordicity Limited

Data Controller: Nordicity Limited ("**Nordicity**")

## Introduction

As part of any recruitment process, Nordicity collects and processes personal information, or personal data, relating to all job applicants.

Nordicity is committed to protecting the privacy and security of **job applicants'** personal information and to meeting its data protection obligations under the General Data Protection Regulation ("**GDPR**") and the Data Protection Act 2018.

The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information during the recruitment process. We are required under the GDPR to notify you of the information contained in this privacy notice.

## Data protection principles

Under the GDPR, there are six data protection principles that Nordicity must comply with. These provide that the personal information we hold about you must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to those purposes.
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits your identification for no longer than is necessary for those purposes.
- Processed in a way that ensures appropriate security of the data.

## What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It does not include anonymised data (i.e. data for which all identifying particulars have been removed). There are also special categories of personal information (as well as personal information on criminal convictions and offences) that require a higher level of protection because they are of a more sensitive nature. These special categories of personal information comprise information about an **individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.**

Nordicity collects, uses and processes a range of personal information about you during the recruitment process. This personal information includes (as applicable):

- your contact details, including your name, address, telephone number and personal e-mail address;
- personal information included in a CV, any application form, cover letter or interview notes;
- references;
- information about your right to work in the UK and copies of proof of right to work documentation;
- copies of qualification certificates;
- a copy of a driving licence;
- other background check documentation;

- details of your skills, qualifications, experience and work history with previous employers; and
- your professional memberships.

Nordicity may also collect, use and process the following special categories of your personal information during the recruitment process (as applicable):

- whether or not you have a disability for which Nordicity needs to make reasonable adjustments during the recruitment process; and
- information about criminal convictions and offences.

How do we collect your personal information?

Nordicity collects personal information about you during the recruitment process either directly from you. We may also collect personal information from other external third parties, such as references from current and former employers, information from background-check providers, information from credit reference agencies and criminal record checks from the Disclosure and Barring Service (DBS).

Nordicity will only seek personal information from third parties during the recruitment process once an offer of employment or engagement has been made to you and we will inform you that we are doing so.

You are under no statutory or contractual obligation to provide personal information to Nordicity during the recruitment process.

Your personal information may be stored in different places, including on your application record, in **Nordicity's cloud**-based storage systems and in other of its IT systems, such as its e-mail system.

Why and how do we use your personal information?

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following circumstances:

- Where we need to do so to take steps at your request prior to entering into a contract with you, or to enter into a contract with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms are not overridden by our interests.

We need all the types of personal information listed under *What types of personal information do we collect about you?* primarily to enable us to take steps at your request to enter into a contract with you or to enable us to comply with our legal obligations. In some cases, we may also use your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms are not overridden by our interests.

Our legitimate interests include: pursuing our business by employing employees, workers and contractors; managing the recruitment process; conducting due diligence on prospective staff and performing effective internal administration.

The purposes for which we are processing, or will process, your personal information are to:

- manage the recruitment process and assess your suitability for employment or engagement;
- decide to whom to offer a job;
- comply with statutory and/or regulatory requirements and obligations (e.g. checking your right to work in the UK);
- comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations;

- ensure compliance with your statutory rights;
- ensure effective human resources (HR), personnel management and business administration; and
- enable us to establish, exercise or defend possible legal claims.

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

What if you fail to provide personal information?

If you fail to provide certain personal information when requested, we may not be able to process your job application properly, we may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory rights.

Why and how do we use your sensitive personal information?

We will only collect and use your sensitive personal information (which includes special categories of personal information and information about criminal convictions and offences) when the law allows us to.

Some special categories of personal information (i.e. information about your health, and information about criminal convictions and offences) is processed so that we can perform or exercise our obligations or rights under employment law and in line with our data protection policy.

We may also process information about your health and information about any criminal convictions and offences, where we have your explicit written consent. In this case, we will first provide you with full details of the personal information we would like and the reason we need it, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time.

The purposes for which we will process health information and information about any criminal convictions and offences, are to:

- assess your suitability for employment or engagement;
- comply with statutory and/or regulatory requirements and obligations (e.g. carrying out criminal record checks);
- comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations;
- ensure compliance with your statutory rights;
- ascertain your fitness to work; and
- ensure effective HR, personnel management and business administration.

Change of purpose

We will only use your personal information for the purposes for which we collected it (i.e. for the job for which you have applied). However, if your job application is unsuccessful, Nordicity may wish to keep your personal information on file for in case there are future suitable employment opportunities. We will ask for your consent before we keep your personal information on file for this purpose. Your consent can be withdrawn at any time.

Who has access to your personal information?

Your personal information may be shared internally within Nordicity for the purposes of the recruitment process. Nordicity will not share your personal information with third parties during the recruitment process.

If your job application is successful, we may also share your personal information with third parties (and their designated agents), including:

- external organisations for the purposes of conducting pre-employment reference and employment background checks;
- the DBS, to obtain a criminal record check;
- former employers, to obtain references; and
- professional advisors, such as lawyers.

How does Nordicity protect your personal information?

Nordicity has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees who have a business need to know in order to perform their job duties and responsibilities.

Where your personal information is shared with third parties, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

Nordicity also has in place procedures to deal with a suspected data security breach and we will notify the **Information Commissioner's Office (ICO)**, or any other applicable supervisory authority or regulator, and you of a suspected breach where we are legally required to do so.

For how long will we keep your personal information?

Nordicity will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

If your application for employment or engagement is unsuccessful, Nordicity will generally hold your personal information for 12 months after the end of the relevant recruitment exercise but this is subject to: (a) any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records, and (b) the retention of some types of personal information for up to six years to protect against legal risk (e.g. if they could be relevant to a possible legal claim in a tribunal, County Court or High Court).

If you have consented to Nordicity keeping your personal information on file for future suitable employment opportunities, we will hold your personal information for a further six months after the end of the relevant recruitment exercise, or until you withdraw your consent, whichever is earlier.

Personal information which is no longer to be retained will be securely destroyed or permanently erased from our IT systems. Where applicable, we will also require third parties to destroy or erase your personal information.

Your rights in connection with your personal information

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- Request access to your personal information: This is usually known as making a 'data subject access request' and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request rectification of your personal information: This enables you to have any inaccurate or incomplete personal information we hold about you corrected.
- Request the erasure of your personal information: This enables you to ask us to delete or remove your personal information where there is no compelling reason for its continued processing (e.g. it is no longer necessary in relation to the purpose for which it was originally collected).

- Restrict the processing of your personal information: This enables you to ask us to suspend the processing of your personal information (e.g. if you contest its accuracy and so want us to verify its accuracy).
- Object to the processing of your personal information: This enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground.
- Data portability: This gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact Nordicity information officer. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact Nordicity's information officer. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that Nordicity has not complied with your data protection rights, you have the right to make a complaint to the ICO at any time.

Transferring personal information outside the European Economic Area

Nordicity may transfer your personal information to countries outside the European Economic Area.

Changes to this privacy notice

Nordicity reserves the right to update or amend this privacy notice at any time. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

Information officer contact:

If you have any questions about this privacy notice or how Nordicity handles your personal information, please contact:

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