

## Oceans ESU Ltd: GDPR Candidate privacy notice (UK)

### WHAT IS THE PURPOSE OF THIS DOCUMENT?

Oceans ESU Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you which we collect when you apply for a position with us by email, through our website or other recruitment websites, such as Indeed or Reed, or through one of our recruitment agencies. It makes you aware of how we collect, store and use your personal data, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### 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

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- Any information you have provided to us in your curriculum vitae and covering letter.
- Any information you have provided on your CV, covering letter or your application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview or assessment day.
- Any information gathered during an interview or assessment day, including test scores, assessor notes.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs and sexual orientation.
- Information about your health, including any medical condition, health and sickness records.

## HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate, when you send a CV and covering letter to us, either directly by email, or via an online job advertisement site.
- Recruitment agencies, from which we collect the following categories of data: name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Your named referees, from whom we collect the following categories of data: name, employment history, qualifications, performance records.
- We may collect information from publicly accessible sources (e.g. websites and social media including Linked In).

## HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Communicate with you about any future vacancies we may have available.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We will need to process your personal data to consider you for employment with us where you submit your details to us via email, through a job advertisement site or recruitment company. It is in our legitimate interests in the operation of our business in order to be able to deal with new enquiries, for example, to assess your job application and to decide whether to appoint you.

We also need to process your personal information in order for us to take necessary steps at your request prior to potentially entering into a contract of employment, and for us to comply with our obligations under any contract which we may enter into with you.

Having received your application we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for a face to face interview (or Skype interview) and/or an assessment day.

We will use the information you provide to us at the interview or assessment date to decide whether to offer you the work. If we decide to offer you the work, we will then take up references before confirming your appointment.

### **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 a credit check or 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 a test or 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.

### **AUTOMATED DECISION-MAKING**

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

### **DATA SHARING**

#### **Why might you share my personal information with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application: Alcumus PSM (HR and H&S Consultants) and any organisation which we are partnering with to deliver any particular project for which are looking to employ you. All such third parties are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow such third parties to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **DATA SECURITY**

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. Details of these measures may be obtained from the Data Protection Manager.

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.

## DATA RETENTION

### How long will you use my information for?

We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to work. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### Your rights in connection with personal information

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

- **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.
- **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.
- **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).
- **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 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.
- **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.
- **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 the Data Protection Manager in writing e.g. via email.

## **DATA PROTECTION MANAGER**

We have appointed a Data Protection Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Manager (contact details below).

If you have any concerns relating to data protection, please contact the Data Protection Manager in the first instance. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)), the UK supervisory authority for data protection issues.

**If you have any questions about this privacy notice, please contact the Data Protection Manager:** Jessie Wheat, Oceans ESU Ltd, The Business Village @BarnsleyBIC, Innovation Way, Barnsley, S75 1JL, United Kingdom

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