



# **General Data Protection Privacy Notice**

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under the general data protection legislation. Please ensure that you read this privacy notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

## Who collects the information

Tipton & Coseley Building Society is a 'data controller' and gathers and uses certain information about you. In this notice, references to 'we' or 'us' mean the Society.

## **Data protection principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Privacy Notice.

## About the information we collect and hold

We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Details of your qualifications, experience, employment history (including job titles) and interests; and
- Information regarding your criminal record;

We will also collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications;
- Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs);
- Information regarding your credit history in credit searches undertaken
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information to prove your right to work in the UK;
- A copy of your driving licence;
- Your image in CCTV; and
- Details of your referees.

You are required by law in order to enter into your contract of employment to provide the above information to us to enable us to verify your right to work and suitability for the position.

## How we collect the information

We may collect this information from you, your referees (details of whom you will have provided), your education provider, and the relevant professional body, the Disclosure and Barring Service (DBS), the Home Office and a Credit Reference Agency.

We also collect this information from door entry systems, automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and internet facilities, telephones, voicemail, mobile phone records, data loss prevention tools, next-generation firewalls, unified threat management systems, mobile device management systems and other relevant websites and applications.

## Why we collect the information and how we use it

We will typically collect and use this information for the following purposes:

- Due diligence prior to entering into a contract of employment;
- Compliance with a legal obligation to check that you are eligible to work in the UK;
- For the performance of a task carried out in the public interest; and
- For the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate.

## How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators as required to comply with the law.

## Sensitive personal information and criminal records information

Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Data Privacy Policy. In order for us to process sensitive personal information we will require your explicit consent as required under the General Data Protection Regulations.

### Where information may be held

All employee information is currently held at our Head Office but we retain the right to store it securely at any of our branches or electronically.

### How long we keep your information

How long we keep your information will depend on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

### Your rights to correct and access your information and to ask for it to be erased

Please contact our Data Protection Officer (DPO), Mark Ferguson, who can be contacted at the Tipton & Coseley Building Society, 70 Owen Street, Tipton, West Midlands DY4 8HG, or by email: mark.ferguson@thetipton.co.uk if, in accordance with applicable law you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice.

In some circumstances, you have the right to withdraw your consent to our processing of your personal information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so.

You also have the right to ask our Data Protection Officer for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten if you ask for it.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <u>https://ico.org.uk/make-a-complaint/</u> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.