



Version 1 — March 2024

# Job Applicant Privacy Notice

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**Data Controller:** Jones and Palmer Limited  
First Floor, 87 Carver Street, Birmingham, B1 3AL  
0121 236 9007

**Data Contact:** Steven Tolley, Director of Innovation  
[data@jonesandpalmer.co.uk](mailto:data@jonesandpalmer.co.uk)

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As part of any 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.

## What information do we collect?

We collect a range of information about you. This includes:

- 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 pay, including benefit entitlements;
- whether you have a disability for which we need to make reasonable adjustments during the recruitment process; and,
- information about your entitlement to work in the UK.

We collect this information in a variety of ways. For example, data might be contained in application forms, online applications, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We will also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

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

## Why do we process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we're complying with our legal obligations. For example, we're 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 also need to process data from job applicants to respond to and defend against legal claims.

We process health information where provided by the candidate to make sure we make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.

For some roles, we seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for the purposes of preventing or detecting unlawful acts.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

## Who has access to the data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR, hiring managers, interviewers involved in the recruitment process and IT 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 offer you a role with the Company. We will then share your data with former employers to obtain references for you, and the Disclosure and Barring Service to obtain necessary criminal records checks.

Your data may be transferred outside the UK for storage purposes. Data is transferred outside the UK on the basis of a declaration of adequacy.

## How do we protect 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. This includes two-factor authentication for IT systems, securely destroying paper files, and using cloud-based file storage to store data.

## For how long do we keep data?

If your application for employment is unsuccessful, we will hold your data on file for up to 1 year after the end of the relevant recruitment process.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your HR file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## Your rights

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

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact [data@jonesandpalmer.co.uk](mailto:data@jonesandpalmer.co.uk). If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company 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. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK, satisfactory references, evidence of qualifications and a satisfactory criminal records check.

## Automated decision-making

Recruitment processes are not based solely on automated decision-making.