

PRIVACY NOTICE – JOB APPLICANTS

Introduction

Wylie & Bisset, a registered limited liability partnership (Ref: SO301911), with its registered office at 168 Bath Street, Glasgow, G2 4TP, is a data controller and is registered with the Information Commissioner (Ref: Z2617403).

In order to meet the principles of GDPR (2018), we commit to the following:

- Data is processed lawfully, fairly and transparently
- Data is processed for specific, explicit and legitimate purposes
- Processing is adequate, relevant and limited to the purposes set out
- Data is accurate and current
- Data is kept for no longer than necessary
- Data is held securely.

The rest of this document details our approach.

Purpose and scope

This privacy notice explains the purposes for which we will hold and use your personal data. It also explains your rights to access your data under data protection laws, or seek to have it rectified or deleted.

Personal data which we collect about you

The personal data about you that we will collect includes:

- contact name and address (including email and telephone numbers);
- details of your qualifications and training, skills, experience and employment history;
- details of your current remuneration, including any benefits;
- any appropriate information on disability or other special cases which need to be taken into account in the recruitment process;
- information about your legal right to work in the UK;
- any other information about you that you have given to us.

We will collect this information in a variety of ways. For example, information may be contained within job applications or CVs, passport or identity documents, assessment and interview notes. We may also collect personal data from third parties, eg, referees or former employers, but only once a job offer has been made.

Purposes of processing

We will process your personal data for the purposes of:

- Making decisions about employing you
- Ensuring that we comply with employment legislation, professional body standards and best practice

- Performing our obligations and exercising any rights imposed or conferred on us by law in connection with your employment; and
- Otherwise managing and administering the employment relationship and dealing with any issues arising from it or in connection with it.

Disclosure of your personal data

We may need to share some of your personal data with third parties in order to fulfil our purposes and for those third parties to provide services to us to support our operations and activities. When we share personal data with a third party, either another data controller or a data processor, we will always make sure that we have the necessary contracts in place to ensure the security of your personal data, that those third parties act on our instructions and do not use the personal data for their own purposes.

We will only share your personal data in accordance with the law. All the third parties with whom we share personal data are required to take appropriate security measures to protect your personal data in line with our own policies and to comply with Data Protection law and with their own policies too. We may also need to share your personal information with a regulator to comply with the law.

Examples of third parties we may share personal data with include:

- any person specified by you, eg, where you ask us to request a reference from that person;
- any person we appoint to provide any services to or on behalf of us. This includes any person involved in delivering or assisting in, or advising on, the provision or implementation of contracts of employment or the recruitment process;
- any person to which we are legally obliged to disclose any of your personal data.

Retention of your personal data

We will retain your personal data for so long as we reasonably require in light of the purpose(s) for which we are holding it and all relevant legal, commercial and operational considerations.

As a guide, we envisage that your personal data will be retained as follows:

Type of employment record	Retention period
Job applications and interview records of unsuccessful applicants	A short period e.g. 12 months after notifying unsuccessful candidates, including those kept for future reference

Access to your personal data

You have a right (referred to as a data subject access request, “SAR”) to have access to the personal data which we hold about you subject to certain limitations. If you would like to exercise that right, you must submit a written request to DPO/DP Rep (dpo@wyliebisset.com), specifying the information which you want us to provide to you (or give you access to).

Corrections to your personal data

You have a right (referred to as the right to rectification) to have your personal data rectified if it is inaccurate or incomplete.

If you become aware that any of the data which we hold about you is inaccurate, you should inform the DPO/DP Rep as soon as practicable.

Deletion of your personal data

You have a right (referred to as the right to erasure) to request the deletion of removal of your personal data where there is no compelling reason for its continued processing.

Your right to make such a request will arise in specific circumstances, for example, where data is no longer necessary for the purposes for which it was collected or where you withdraw your consent for processing of your data (and this is the sole basis on which your data is processed).

If you would like to exercise this right you must submit a written request to the DPO/DP Rep, specifying the information which you wish deleted. We will then consider this request in accordance with our obligations under data protection laws.

Transferring your personal data

You have a right (referred to as the right to data portability) to obtain and reuse your personal data for your own purposes across different services. This right allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way.

If you would like to exercise this right, you must submit a written request to DPO/DP Rep, specifying the information which you wish to be transferred.

Where the right applies, we are obliged to comply with any such request within one month. This may be extended to two months where the rectification request is complex or where multiple requests are received at the same time. We will notify you in writing if an extension is necessary.

Restricting use of your personal data

You have a right (referred to as the right to restrict processing) to block or suppress the processing of personal data in certain circumstances.

If, for example, you contest the accuracy of the personal data, processing may be restricted until the accuracy of the personal data has been verified. This may also apply where you contest that the processing is unlawful.

If you would like to exercise this right, you must submit a written request to DPO/DP Rep.

Objecting to the use of your personal data

You have a right to object to processing of your personal data if it is based on the performance of a legal task or is based on our legitimate interests. You also have the right to object where we process your information for research purposes.

If you would like to exercise this right, you must submit a written request to DPO/DP outlining your grounds of objection. We will then consider this request in accordance with our obligations under data protection laws.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures may be obtained from our DPO. We have put in place procedures to deal with any suspected information security incidents that could result in a personal data breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

International transfers

All personal data are processed in the UK by our staff or by people acting on our behalf and with our authority. However, for the purposes of IT hosting and maintenance, we use data processors located within the EU. No third parties have access to your personal data unless the law allows them to do so. We do not transfer your personal data outside the EEA.

Rights in relation to automated processing

Recruitment processes are not based solely on automated decision making.

Withdrawal of consent

You have a right to withdraw your consent to our use of your personal data for a specific purpose, at any time, where our use of your personal data for the purpose relies on consent as a legal condition for that use. If you wish to withdraw consent to processing, please contact DPO.

No fee usually required

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Data protection officer and complaints

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing any questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any request to exercise your legal rights under Data Protection Law, please contact the DPO using the details set out below:

Allan O'Hagan, IT Director

Email: dpo@wyliebisset.com

Tel: 0141 566 7000

168 Bath Street

Glasgow

G2 4TP

You have a right to complain to the Information Commissioner's Office if you think that there is a problem with how we are handling your data, contact details are as follows:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone – 0303 123 1113 (local rate) or 01625 545 745

Website – <https://ico.org.uk/concerns>