

Privacy notice for job applicants

June 2020



1. What is the purpose of this document?

This notice describes how CDC collects and uses your information in accordance with data protection laws

As a data controller CDC is responsible for the processing of your personal data and we are required to notify you about such processing.

This notice applies to people applying for jobs within CDC and certain of its affiliates. We may update this notice at any time.

2. The kind of information we hold about you

Personal data is any information which identifies you as an individual.

Some **special categories of personal data require a higher level of protection**. These include information about your race or ethnicity, religious beliefs, sexual orientation, criminal records or health information.

3. How is your personal data collected?

We collect personal data in the recruitment process, either directly from you or a recruiter, an employment agency, background check provider or occupational health practitioner. References are obtained from former employers or colleagues.

4. How we will use information about you

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address)	From you	To contact you in the course of an application and in any subsequent employment Legitimate interest: to maintain job application records and good employment practice	When contacting you about your application (or, while your details are active in our recruitment platform, in relation to other positions for which we consider you may be suitable). To contact you during any subsequent employment.
Your nationality and immigration status	From you	To review your suitability for the job application To comply with our legal obligations Legitimate interest: to maintain job application records and good employment practice	To manage the recruitment process, including assessing any necessary right to work requirements should you be recruited for the position
Information about your health (including sensitive personal data regarding your	From you	To support you with any reasonable adjustments in the recruitment process. To comply with our legal obligations	To put in place any reasonable adjustments during the recruitment process.

physical and/or mental health)		<p>Legitimate interest: to maintain job application records, good employment practice, to comply with legal, regulatory and corporate governance obligations and to ensure safe working practices</p> <p>To protect your vital interest in the case of a medical emergency</p>	<p>To assess your capacity to work on health grounds</p> <p>To assess our legal obligations to you as your potential employer</p> <p>In the onboarding process, we may share information that you have provided with medical and occupational health professionals that we engage</p> <p>We may use information about your disability status, physical or mental health, to ensure your health and safety in the workplace and to assess your fitness to work and appropriate workplace adjustments</p>
Your gender, racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	For management information purposes, to comply with our equal opportunities monitoring obligations and to follow our policies
Criminal records information, including, where applicable, the results of Disclosure and Barring Service (DBS) checks	From you	<p>To comply with our legal obligations</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)</p>	<p>In the onboarding process, to carry out statutory checks and screening relating to pre-employment, fitness and proprietary checks</p> <p>For certain roles, information may be shared with DBS and other regulatory authorities as required by regulation</p>

We may process your personal data for other purposes as may be required by law or as you may request from time to time.

5. Data sharing

It may be necessary to share your data with third parties, including third-party service providers, our professional advisers and other affiliates and subsidiaries in the CDC group. We may transfer your personal data to such parties outside the UK or the European Economic Area (EEA). We require third parties to respect the security of your data and to treat it in accordance with the law. If you have any questions about our international transfers or if you would like a list of the data importers we transfer data to please contact us.

5.1 How secure is my personal data with third-party service providers and other entities in the CDC Group?

All our third-party service providers and other affiliates and subsidiaries in the CDC group are required to take appropriate security measures to protect your personal data in line with our policies. Save where required by law or for statistical purposes, we generally do not allow our third-party service providers 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.

5.2 When might you share my personal data with other entities in the group?

We will share your personal data with other affiliates and subsidiaries in the CDC group as part of our regular reporting activities on company performance, recruitment, career planning and succession purposes, business reorganisation, group restructuring, system maintenance support and hosting of data.

5.3 Transferring information outside the EEA

In order to perform our contract with you, sometimes we will transfer your personal data to third-party service providers outside of the UK or the EEA. Such transfers will generally be based on the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement) or another lawful transfer mechanism to ensure that your personal data is subject to a level of data protection which applies within the EEA. For further information about data transfers you may contact us by email to dataprotection@cdcgroup.com.

6. Data security

We have measures in place to protect the security of your personal data. Further details of these measures are available upon request to the data protection officer (DPO).

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know and who are subject to a duty of confidentiality.

We have procedures in place 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.

7. Data retention

How long will you use my information for? We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for or as required by law.

If you are in a specific hiring process or if applying for several roles, your details will remain active in our recruitment platform. Once that process is complete, your details will be archived after 6 months and you will be notified. Your details will be deleted 6 months after archiving. If you choose to do so, you can delete your details at any time prior to this by logging in to the platform and deleting your details.

8. Rights of access, correction, erasure, and restriction

8.1 Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. We would be grateful if you could keep us informed if your personal data changes during the period that we hold your data. You can also do this by updating your details in the platform.

8.2 Your rights in connection with personal data

Under certain circumstances, you lawfully have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. You can also do this yourself in the platform.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below). You can also delete your details in the platform at any time.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you consider it is wrong to process on this ground. You should explain your particular situation and we will consider your objection.

Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the DPO in writing.

Refuse automated individual decision-making, including profiling, which produces a legal effect or could significantly affect you and so have the right to obtain human intervention on the part of CDC, to express your point of view, and to be able to contest the decision.

There may be circumstances in which we are not legally required to comply with your request or an exemption may apply under law.

9. Data protection officer

CDC has appointed a DPO to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

10. Changes to this privacy notice

We reserve the right to update this privacy notice at any time. A new privacy notice will be provided when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.


If you have any questions about this privacy notice or about our use of your information, please contact the DPO via dataprotection@cdcgroup.com



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