

Recruitment Data Privacy Policy – CRP-GL-LC-PCY-012

Application

Penspen receives your personal data when you apply directly for an advertised role via <http://www.penspen.com/work-penspen/current-vacancies/>

This policy explains how we process personal data received as part of the recruitment process. When you apply for a Penspen vacancy online whilst you have no statutory or contractual obligation to do so you **MUST** consent to us collecting and storing your personal information to enable us to process your application. You will not be able to submit your enquiry without consenting to us storing your basic personal data, which will be identified as mandatory within the application. The mandatory information is required in order for Penspen to consider an application for a vacancy or meet its statutory monitoring and reporting responsibilities, however, where indicated, some of the information is optional and you can choose not to complete.

Your rights and your Personal Data

Unless subject to exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which Penspen holds about you;
- The right to request that Penspen corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Penspen to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data;
- The right to lodge a complaint with the Information Commissioners Office.

Data Protection Statement

Penspen complies with the General Data Protection Regulations (GDPR) by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

The personal data you provide in your application and as part of the recruitment process will only be held and processed for the purpose of the selection processes of Penspen and in connection with any subsequent employment or placement, unless otherwise indicated and consented to. If your application is unsuccessful Penspen will keep your personal data on file in case there are future employment opportunities for which you may be suited. Penspen will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time. If your application for employment is successful personal data gathered through the recruitment process will be transferred to your personnel file and retained during employment. The periods for which your data will be held will be provided to you in a new privacy notice. Your data will be retained only for as long as is permitted by UK legislation and then destroyed.

By submitting your personal data and application, you:

- 1) Declare that you have read, understood and accepted the statements set out in this policy;
- 2) Are declaring that the information given in the application is complete and true to the best of your knowledge, and understand that deliberate omissions and incorrect statements could lead to your application being rejected or to your dismissal;
- 3) Are giving your consent to the processing of the information contained in this application;
- 4) Are authorising Penspen to verify and have verified on their behalf all statements contained in this application and to make any necessary background checks .

Automatic Information

We automatically receive and save certain types of information whenever you interact with this website. We use the information to monitor website traffic and to assist with the navigation and user experience of the website.

Information that we will automatically receive includes:

- Requested URL (Uniform Resource Locator)
- IP (Internet protocol) address (this may or may not identify a specific computer)
- Domain name from which you access the internet
- Referring URL
- Software (browser/operating system) used to access the page
- Date and time pages were visited

Cookies

Please see Penspen's Cookie Policy <http://www.penspen.com/cookie-policy/>

Automated Processing

Penspen advises that it uses automated processing of applications only where:

- necessary for entering or performing a contract, or
- authorised by law; or
- with the candidate's explicit consent

Request to have personal data amended

In the event that any of your personal data is recorded incorrectly or is no longer up to date and you would like to have it amended, Penspen will undertake an update to your registration within two weeks of receiving an updated Curriculum Vitae.

Under the GDPR you have the right to ask for access to your personal data. Once Penspen have verified your identity we will provide the information you requested within 30 days.

Request to have personal data removed or deleted

Upon receipt of a request to delete an individual's personal data, Penspen will ensure that your personal data is deleted within 30 days.

Notification of Breaches

Whilst Penspen do not store, or at any time request, financial information from candidates, we do store highly personal information contained within your Curriculum Vitae and other information gathered through the end to end recruitment process. We are aware of our responsibility as data controller to protect your information and to only share details with third parties upon receipt of your explicit consent. All of our systems are protected and only the employees of Penspen directly involved in the recruitment process have access to the personal data stored in your application.

In the unlikely event that our computer systems are compromised and there is a potential loss of confidentiality we will report this breach to you.

In the unlikely event that personal data is taken or exposed from Penspen records without our consent, we will provide reports surrounding that exposure within 72 hours of being notified of such an event and take any action necessary to restore security of your personal data.

Access

If Penspen Resourcing receive a request for access to personal information we will verify your identity before releasing your personal data to you. We will not release information to any third party.

If you would like to make a request for access to your personal information please contact us

Complaints procedure

If you believe that Penspen has not complied with your data protection rights, you may raise your complaint directly with Penspen, or alternately you may also complain to the Information Commissioner.

Signed:

**Gillian Empringham
Executive Vice President, HR
The Penspen Group Limited**