

## Global Privacy Notice for Job Applicants

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**Issue Date:** November 2018

<b>Data controller:</b>	Unispace Global
<b>Data protection committee:</b>	<a href="mailto:PrivacyCommittee@unispace.com">PrivacyCommittee@unispace.com</a>

As part of any recruitment process, the company collects and processes personal data relating to job applicants. The company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### Information collected

The company collects a range of information about you. This includes:

- your name, address and contact details, including email address, telephone number, date of birth and gender;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers;
- information about your current level of remuneration, including benefit entitlements;
- information about your nationality and entitlement to work in the country in which you are employed;
- information about your criminal record;
- information about medical or health conditions, including whether you have a disability for which the company needs to make reasonable adjustments; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

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

The company may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The company will seek information from third parties only once a job offer to you has been made and will inform you that it is 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).

### Reasons for processing Personal Data

The company needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, the company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the company to manage the recruitment process, assess and

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confirm a candidate's suitability for employment and decide to whom to offer a job. The company may also need to process data from job applicants to respond to and defend against legal claims.

The company may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

For equal opportunities monitoring purposes, the company collects information about ethnic origin, sexual orientation, health and religion or belief.

For some roles, the company is obliged to seek information about criminal convictions and offences. Where the company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

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

## Access to Data

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The company will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

If you are an EU citizen, your data may be transferred to countries outside the European Economic Area (EEA) to facilitate central HR administration. Data is transferred outside the EEA based on a legally binding declaration of adequacy or in the case of Vendors in the United States, the EU-US Privacy Shield.

## How does the company protect data?

The company takes the security of your data seriously. The company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Access is limited to a need to know basis, and access is granted on the principal of least privilege. That is, access is minimised to a level to allow individuals to carry out their job.

Where the company engages third parties to process personal data on its behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and company measures to ensure the security of data.

## For how long does the company keep data?

If your application for employment is unsuccessful, the company will hold your data on file for 12 months after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel 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; and
- object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact: [PrivacyCommittee@unispace.com](mailto:PrivacyCommittee@unispace.com)

If you believe that the company has not complied with your data protection rights, you can complain to the Information Commissioner.

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, the company may not be able to process your application properly or at all.

### **Automated decision-making**

Employment decisions are not based solely on automated decision-making.