

JOB APPLICANT PRIVACY NOTICE

About this document

JLA Limited (**"the Company"**) collects, uses and shares personal data relating to its job applicants to manage the recruitment process. The Company is committed to complying with its data protection obligations.



This privacy notice explains what personal data we will hold about you, how we collect it, and how we will use and may share information about you during and after the application process. We are required to notify you of this information, under data protection legislation. **Please ensure that you read this notice** (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you. This notice applies to current and former job applicants.

The Company is a "data controller" for the purposes of the applicable UK data protection legislation. This means that we are responsible for deciding how and why we hold and use personal data about you. This information is also used by our group companies, details of which can be obtained from the Head of Legal (our 'group companies') and so, in this notice, references to 'we' or 'us' mean the Company and our group companies.

The best contact details to use if you have any queries about this privacy notice or about our handling of your personal data are as follows:

Data Privacy Manager
Head of HR

headoflegal@jla.com
headofhr@jla.com

Data protection principles

The Company will ensure that it protects personal data by complying with a set of principles relating to the processing of personal data, as set out within the applicable data protection legislation, which require personal data to be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.



The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

The kind of information we collect and hold about you

The table set out in the Appendix summarises the information we collect and hold during the recruitment process, how and why we do so, how we use it and with whom it may be shared. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

If you fail to provide personal data

If you fail to provide certain information when requested, we may be prevented from processing your application properly or at all; or from entering into a contract of employment with you if you are successful in your application; or from complying with our legal obligations (such as to ensure that you are legally entitled to work in the UK).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal data without your knowledge in some limited situations where an appropriate exemption under the applicable data protection legislation applies. For example, this may apply where we are asked to share information with law enforcement agencies as part of their investigations. In these situations, we would however comply with the applicable data protection legislation.

How we use sensitive personal data

We will use information about your physical or mental health, or disability status, where this is necessary to assess whether you will be able to comply with a requirement to undergo an assessment that is, an interview or other assessment designed to give an indication of your suitability for the work concerned or whether adjustments should be made to the recruitment process. We will also use this information to assess whether you will be able to carry out a function that is intrinsic to the role that you have applied for.



Particularly sensitive personal data requires higher levels of protection. Under the applicable data protection legislation, we need to have further justification for collecting, storing and using these types of personal data.

Information about criminal convictions and offences

We will only collect information about criminal convictions and offences if it is appropriate given the nature of your role with us and where we are legally able to do so.

For example, if you are applying for an engineering role we will collect information from the Disclosure and Barring Service (“DBS”) about criminal convictions as part of the recruitment process or we may be notified of such information directly by you. We hold the results of those DBS checks, as this can be a requirement for entry into some customer premises such as schools, care homes and prisons and can be a precondition of some public sector contracts. We are allowed to

use your personal data in this way in order to protect the vital interests of vulnerable people. If you would like further information about this, please contact our Data Privacy Manager and request a copy of our Criminal Records Policy.

Automated decision making

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

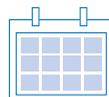
We do not envisage that any decisions will be taken about you solely using automated means, however we will notify you in writing if this position changes.

Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above.

How long we keep your information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.



If your application is unsuccessful, the Company will hold your personal data for 6 months after the end of the recruitment process. At the end of that period, your personal information will be securely destroyed in accordance with our data destruction policy.

If your application is successful, further information will be provided in our Employee, Worker and Contractor Privacy Notice.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Your rights and duties

You have the right to **request access** to your personal data (commonly known as a “subject access request”). This enables you to ask for and receive a copy of the personal data we hold about you.



You can also **request the correction** of any information that we hold. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the recruitment process.

You also have the right to ask for some but not all of the information we hold and process to be erased (**the 'right to be forgotten'**) in certain circumstances. Our Data Privacy Manager will provide you with further information about the right to be forgotten, if you ask for it.

In some cases, you may **object to processing** of your personal data where we are relying on a legitimate interest to process your personal data and there is something about your particular situation which makes you want to object to processing on this ground. We would be happy to discuss this with you and try and address your concerns.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to **withdraw your consent** for that specific processing at any time. To withdraw your consent, please contact the Data Privacy Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless the applicable data protection legislation otherwise permits us to do so (for example, as a result of exemptions under the law). This will not affect the lawfulness of the processing that you consented to before you withdrew your consent.

Please contact our Data Privacy Manager for more information about any of the above rights.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice 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.

How to complain

We hope that our Data Privacy Manager can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: **0303 123 1113** for further information about your rights and how to make a formal complaint.



Appendix

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your contact details, including your name, address, telephone, personal e-mail address and date of birth. Personal information included in a CV, any application form, cover letter or interview notes.	From you and/or a recruitment agency.	Legitimate interest: to carry out a fair recruitment process. To progress your application, arrange interviews and inform you of the outcome at all stages.	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome. To inform the relevant manager or department of your application.
Details of your qualifications, experience, employment history (including job titles, salary and working hours).	From you, a recruitment agency, in the completed application form and interview notes (if relevant).	Legitimate interest: to carry out a fair recruitment process. To make an informed decision to shortlist for interview and (if relevant) to recruit.	To make an informed recruitment decision.
Whether or not you have a disability and information relating to your health.	From you	To comply with our duty to make reasonable adjustments and with other disability discrimination obligations. Legitimate interests: to ensure you are fit to perform the duties.	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies. To make an informed recruitment decision.
Details of your referees.	From you or your completed application form.	Legitimate interest: to carry out a fair recruitment process.	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee.
Information regarding your academic and professional qualifications.	From you, from your education provider and from the relevant professional body.	Legitimate interest: to verify the qualifications information provided by you.	To make an informed recruitment decision.
Criminal records information, including the results of Disclosure and Barring Service (DBS) checks.	From you and from the Disclosure and Barring Service.	To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you. 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.	To carry out statutory checks. To make an informed recruitment decision. To carry out statutory checks. Information shared with DBS and other regulatory authorities as required.

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information.	From you and, where necessary, the Home Office.	<p>To enter into the employment contract.</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to maintain employment records. To carry out obligations and exercise rights in employment law.</p>	To carry out right to work checks. Information may be shared with the Home Office.
A copy of your driving licence.	From you.	<p>To enter into the employment contract.</p> <p>To comply with our legal obligations and the terms of our insurance.</p>	<p>To make an informed recruitment decision.</p> <p>To ensure that you have a clean driving licence</p> <p>Information may be shared with our insurer.</p>



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