

## RECRUITMENT PRIVACY POLICY

We want to help people find the best role for them and to help them make the most of a range of opportunities to develop within our business. To achieve this and support people effectively, we need to collect and use a range of personal information. This privacy policy explains what personal information we will use in the recruitment process and why. Please read it – it's important to you.

### Who are we?

Hopefully you've already checked us out as you want to work with us. But just in case, we are Wiltshire Friendly Society (<https://www.wiltshirefriendly.com/about>). While we provide income replacement plans to individuals, employers for the benefit of their employees and sports and leisure clubs. Our head office is Holloway House, Epsom Square, Trowbridge, BA14 0XG.

### Why we process your personal information

We need to collect and process sufficient personal information about you to consider your application for a vacancy. This includes:

1. to assess your suitability for any vacancy you apply for.
2. to make offers of employment and provide contracts if you are successful in your application.
3. to meet legal obligations (such as payroll, tax, benefits).
4. to determine that you are eligible to live and work in the UK.
5. to monitor compliance with anti-discrimination legislation and our policies.
6. to consider you for alternative vacancies.
7. to help us improve our recruitment practices.

Please consider that if you are unable to provide us with sufficient personal information, we may be unable to assess your suitability for the job applied for or to communicate with you. As your application progresses, we may need to ask you for more personal information. We will let you know what the consequences will be if we are unable to obtain and process personal information about you.

### What personal information we collect about you

As part of the recruitment process we may collect:

1. **demographic information about you** – such as your name, address, date of birth, gender, preferred languages;
2. **your contact details** – telephone numbers, email address, postal address;
3. **employment history** – your CV, application form details, records of education, qualifications, skills and training;
4. **information to identify you** – National Insurance or other identification number, your Visa, Passport or Permission to Work documentation;

5. **sensitive personal information** – health details (including any disabilities that affect your ability to perform your work and that we need to assess and help us consider your workplace needs) and information about your ethnic origin (see equal opportunities below);
6. **suitability for employment** – interview notes, references, the results of criminal records and credit checks (we will ask for your consent to do this at the reference/pre-employment stage);
7. **equal opportunities and anti-discrimination** – we may ask you to provide details of your ethnic origin via our Equal Opportunities Form and whether you have been long term unemployed. You do not have to supply this information. We process it strictly for the purposes of providing equality of opportunity for all, and for monitoring compliance with anti-discrimination legislation.
8. **financial information** – if you are successful in your application, your bank details so we can ensure we pay you on time.

### How long do we keep your personal data for?

We will keep records of your personal information only as long as it is necessary to process your application and to employ you. Please note that if your application is not successful, we will keep your personal information for up to 3 months after the recruitment process has ended. We do this so we can consider you for other suitable vacancies that might become available. You can ask us to erase this information at any time if that is your preference.

If you send us your personal data on an unsolicited basis, for example, submitting a CV that is not connected to a specific role for which we are recruiting, we will retain your personal data for a period of 3 months.

### Who we may share your personal information with

Like many companies, we use 3rd parties to process personal information on our behalf (such as recruitment agencies and providers of services that allow us to verify the details that you provide to us (for example, when we undertake criminal records or credit checks) – these are called ‘data processors’. We have contracts, policies and procedures in place to ensure these companies safeguard personal information entrusted to them, and to only use it under our instructions and for the purposes outlined in this notice.

### Your rights in relation to the personal information we collect

You have a number of rights in relation to the personal information we collect and process about you (certain of these rights will only apply from 25 May 2018):

- a) **Subject Access:** You have a right to be informed if we are processing personal information about you, and if so, to obtain a copy of any personal information held about you by Wiltshire Friendly.  
  
We will seek to comply with any ‘subject access’ request within 1 month of your request being received by us (subject to certain exceptions).
- b) **Rectification:** You can ask us to correct any inaccurate or incomplete personal information.
- c) **Erasure:** You can ask us to delete or remove personal information about you in specific circumstances.
- d) **Withdrawal of Consent:** You can withdraw any consents to processing that you have given us, and prevent further processing of your personal information if there is no other legal basis upon which we can rely.
- e) **Restriction:** You can request that we block or suppress the processing of your personal information in certain circumstances.

- f) **Right to Object:** You can object to (i) direct marketing (including profiling related to direct marketing); (ii) processing based on our legitimate interests (including profiling)
- g) **Portability:** Where we rely on your consent to process your personal information or where processing is necessary for the performance of a contract, you can ask us to provide you with the information in a format that will allow you to transmit it to a third party.
- h) **Raise a Complaint:** If you have a complaint about the way in which we process your personal information and we are unable to resolve it, you can raise it with the UK Data Protection Regulator <https://ico.org.uk/for-the-public/raising-concerns/>
- i) **Profiling:** In certain circumstances, you have the right not to be subject to automated decision making and/or profiling. (We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.)

### Your contact for any queries

Wiltshire Friendly has a designated Data Protection Administrator who should be contacted if you have any queries regarding the interpretation of this notice. The contact details are set out below:

Data Protection Administrator: Lee Davis

Location: Holloway House, Epsom Square, Trowbridge, BA14 0XG

Phone: 01225 752120

Email: [data@wiltshirefriendly.com](mailto:data@wiltshirefriendly.com)