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## **Applicant Privacy Notice**

Data controller: 360 Dot Net Ltd, email <a href="mailto:dpo@360lifecycle.co.uk">dpo@360lifecycle.co.uk</a>

Data protection officer: by email <a href="mailto:dpo@360lifecycle.co.uk">dpo@360lifecycle.co.uk</a>

As part of our recruitment processes, 360 Lifecycle (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.

# 1. What information does the Company collect?

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

- Your name, address and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience and employment history;
- Information about your current level of remuneration, including benefit entitlements:
- Whether you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK; and
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The Company collects 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.

The Company will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check provider, Experian, 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).

# 2. Why does the Company process personal data?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs 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 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 processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Company processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes as permitted by the Data Protection Act 2018, and with the explicit consent of job applicants, which can be withdrawn at any time by contacting <a href="mailto:hr.team@360lifecycle.co.uk">hr.team@360lifecycle.co.uk</a>.

If your application is unsuccessful, the Company will keep your personal data on file in case there are future employment opportunities for which you may be suited. The Company will ask for your consent before it keeps your data for this purpose, and you are free to withdraw your consent at any time by contacting <a href="mailto:hr.team@360lifecycle.co.uk">hr.team@360lifecycle.co.uk</a>.



#### 3. Who has access to data?

Your information will 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 employment background check provider, Experian, to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

#### 4. How does the Company protect data?

The Company takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our Colleagues in the proper performance of their duties.

We have put in place procedures 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.

### 5. For how long does the Company keep data?

If your application for employment is unsuccessful, the Company will hold your data on file for 6 months after the end of the relevant recruitment process. After this period, we will securely destroy your personal information in accordance with our retention schedule. If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.



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.

## 6. Right to complain to ICO

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;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the Company's legitimate grounds for processing data.

#### 7. What if you do not provide personal data?

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. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.



# 8. Automated decision-making

Recruitment processes are not based solely on automated decision-making.