

HONOURABLE ARTILLERY COMPANY

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Applicant Privacy Policy

Data controller: The Honourable Artillery Company
Armoury House
City Road
London
EC1Y 2BQ

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

What information does the HAC collect?

The HAC 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 or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process, and
- information about your entitlement to work in the UK.

The HAC 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 HAC 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 HAC 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).

Why does the HAC process personal data?

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

The HAC may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics and to promote equal opportunities. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. The HAC processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, the HAC is obliged to seek information about criminal convictions and offences. Where the HAC 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 HAC will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has 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 for which you may be considered and IT staff if access to the data is necessary for the performance of their roles.

The HAC will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The HAC 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.

The HAC will not transfer your data outside the European Economic Area.

How does the HAC protect data?

The HAC 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 employees in the proper performance of their duties.

For how long does the HAC keep data?

If your application for employment is unsuccessful, the HAC will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed. In some instances, the HAC may ask your permission to keep your personal data in relation to your application for up to 12 months. This may occur where for example, a future recruitment is planned that you may be suitable to interview for and the HAC would like to contact you again to include you in this process.

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 organisation to change incorrect or incomplete data
- require the HAC 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 HAC is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Rachel Bishop, Data Protection Officer for the HAC by emailing privacy@hac.org.uk or by writing to the Data Controller office address.

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

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the HAC during the recruitment process. However, if you do not provide the information, the HAC may not be able to process your application properly or at all.

Automated decision-making

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