

# PRIVACY POLICY

## JOB APPLICANT PRIVACY NOTICE

As part of any recruitment process, the company collects and processes personal data relating to job applicants. Curley Television Limited, trading name CurleyVision, is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations under the GDPR (General Data Protection Regulations), as amended to the UK-GDPR effective from 31st January 2020.

## WHAT INFORMATION DO WE 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;
- for some jobs, whether or not you have a criminal record or have been the subject of a child protection investigation;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK.

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

If you send us an un-solicited CV (i.e. you are not contacting us about any specific recruitment process) then we will:

- Retain your CV for future recruitment to suitable vacancies. We will inform you that we are doing this and you can ask us to remove your CV from our database if you so choose.

We may also seek information from third parties such as references supplied by former employers, information from criminal records checks from the Disclosure & Barring Service (“DBS”) for some jobs, but only once we make a job offer to you, and we will inform you that we are doing so. Data will be stored in a range of different places, including on your application record, in our talent database systems and on other IT systems (including Company email).

## **WHY DOES THE COMPANY PROCESS PERSONAL DATA?**

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

**We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you.**

**In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is mandatory that we check a successful applicant's eligibility to work in the UK before employment starts.**

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

**Where we rely on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of employees or freelancers and we have concluded that they are not.**

**We will also process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.**

## **WHO HAS ACCESS TO DATA?**

**Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the senior management team and other interviewers involved in the recruitment process.**

**The company will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references about you, and if appropriate with the Disclosure and Barring Service to obtain necessary criminal records checks.**

**The Company will not transfer your data outside the UK.**

## **HOW DOES THE ORGANISATION PROTECT DATA?**

**The company takes the security of your data seriously. We have 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 ORGANISATION KEEP DATA?**

**If your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. At the end of that period, or once you withdraw your consent, your data will be deleted or destroyed.**

**If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your electronic 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 us to change incorrect or incomplete data;**
- **require us 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 we rely on its legitimate interests as the legal ground for processing; and**
- **ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.**

**If you would like to exercise any of these rights, please contact Chris Curley on [chris@curleyman.co.uk](mailto:chris@curleyman.co.uk) who is the person responsible for data protection in the Company. Please mark your email FAO: Chris Curley/Data Protection**

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

## **WHAT IF YOU DO NOT WISH TO 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, we may not be able to process your application properly or at all.**

## **AUTOMATED DECISION-MAKING**

**Our recruitment processes are not based on any automated decision-making.**

## **WHY AND HOW DO WE USE YOUR SENSITIVE PERSONAL INFORMATION?**

**We will only collect and use your sensitive personal information, which includes special categories of personal information about criminal convictions and offences, when the law allows us to.**

**Information about your health, and information about criminal convictions and offences, is processed so that we can perform or exercise our obligations or rights under employment law and in line with our data protection policy.**

**The purposes for which we are processing, or will process, health information and information about any criminal convictions and offences, are to:**

- assess your suitability for employment or engagement**
- comply with statutory and/or regulatory requirements and obligations, e.g. carrying out criminal record checks**
- comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations**
- ensure compliance with your statutory rights**
- ascertain your fitness to work**