



PROGRESS IN  
GOVERNANCE

## **Privacy Notice (Job Applicants)**

# Privacy Notice (Job Applicants)

## 1 BACKGROUND

Last updated: 17 October 2023.

1.1 This policy tells you how we look after your personal data when you apply for a job with us and take part in our recruitment process. It sets out what information we collect about you, what we use it for and who we share it with. It also explains your rights and what to do if you have any concerns.

1.2 We may sometimes need to update this notice, to reflect any changes to the way we manage our day-to-day activities or to comply with new legal requirements. Please check back on this notice before you apply for a new role with us.

## 2 WHO WE ARE AND OTHER IMPORTANT INFORMATION

2.1 We are The CoSec Recruitment Company Ltd, registered in England and Wales with company number 14573305 with our registered address at 2 Vine Cottages, Barling Road, Southend-on-Sea, SS3 0QL (**we, us or our**).

2.2 We are the **controller** for your information (which means we decide what information we collect and how it is used).

2.3 Where we have received your application through a recruitment agency or another company (e.g. a recruitment firm) we act as independent controllers for your information (which means both we and the other company separately decide how your information is used and use it for different reasons).

## 3 CONTACT DETAILS

3.1 If you have any questions about this privacy notice or the way that we use information, please get in touch using the following details:

- **Name:** Laura Higgins
- **Email address:** info@coserecruitment.com

## 4 THE INFORMATION WE COLLECT ABOUT YOU

4.1 **Personal data** means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect and where we receive it from below:

- **Identity Data:** name, title, date of birth, job title, gender, emergency contact name and their relationship to you, passport, driving licence.
- **Contact Data:** personal email address, telephone numbers, home address.
- **Recruitment Data:** copies of right to work documents, interview notes, information you provided in your CV or cover letter as part of the application process, result of due diligence checks.
- **Employment and Qualification Data:** current and/or previous job titles, work history, working hours, training records, professional memberships.

- **Feedback:** information and responses you provide when completing surveys and questionnaires.

## 5 HOW WE USE YOUR INFORMATION

5.1 We are required to identify a legal justification (also known as a lawful basis) for collecting and using your personal data. There are six legal justifications which organisations can rely on. The most relevant of these to us are where we use your personal data to:

- do something that you have given your **consent** for.

5.2 Below is set out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed below, we will update our privacy notice and notify you.

### 5.2.1 Consent

- Where we ask you to provide diversity information.
- Where we have otherwise asked you to provide your consent.

## 6 WHO WE SHARE YOUR INFORMATION WITH

6.1 We share (or may share) your personal data with:

- **Our personnel:** our employees (or other types of workers) who have contracts containing confidentiality and data protection obligations.
- **Our suppliers:** other organisations help us manage our infrastructure, for example recruitment software is licensed to us by TeamDash. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations.
- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business.

## 7 WHERE YOUR INFORMATION IS LOCATED OR TRANSFERRED TO

7.1 Your personal data is stored on TeamDash servers in Sweden.

7.2 We will only transfer information outside of the UK or EEA where we have a valid legal mechanism in place (to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located, e.g. by using contracts approved by the European Commission or UK Secretary of State).

7.3 If you access our systems whilst abroad then your personal data may be stored on services located in that country.

## 8 HOW WE KEEP YOUR INFORMATION SAFE

8.1 We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication (including multi-factor authentication)



- staff policies and training
- incident and breach reporting processes
- business continuity and disaster recovery processes

8.2 If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law).

## 9 HOW LONG WE KEEP YOUR INFORMATION

9.1 Where we are responsible for making decisions about how to collect and use your personal data, we will only keep your personal data for as long as necessary to fulfil the purposes we collected it for or as long as required to fulfil our legal obligations.

9.2 When we consider how long to keep your personal data, we will consider whether it is still necessary to keep it for the purpose which we collected it or whether the same purpose could be achieved by holding less personal data. We will also consider the volume, nature, and sensitivity of the personal data and the potential harm to you if there was an incident affecting your personal data.

9.3 Where you are unsuccessful in obtaining a role with us, we keep your application information for 1 year after our last contact with you.

9.4 If you enter a contract with us, we may keep Identity Data, Contact Data and certain other data (specifically, any exchanges between us by email or any other means) for up to 7 years after the end of our contractual relationship with you.

## 10 YOUR LEGAL RIGHTS

10.1 You have specific legal rights in relation to your personal data. These are as follows:

- **Access:** You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law.
- **Correction:** You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.
- **Deletion:** You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.
- **Restriction:** You can ask us to restrict how we use your personal data and temporarily limit the way we use it (e.g. whilst we check that the personal data we hold for you is correct).
- **Objection:** You can object to us using your personal data if you want us to stop using it. We always comply with your request if you ask us to stop sending you marketing communications. In other cases, if we think there is a good reason for us to keep using the information, we will let you know and explain our decision.
- **Portability:** You can ask us to send you or another organisation an electronic copy of your personal data.
- **Complaints:** If you are unhappy with the way we collect and use your personal data, you can complain to the ICO or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage. You should speak to Laura Higgins in the first instance.

10.2 If you would like to exercise any of your legal rights, please contact:  
info@coserecruitment.com.