



## Whitetree Candidate Privacy Policy

Welcome to Whitetree's Candidate Privacy Notice. This Privacy Policy applies if you are applying for a staff position at Whitetree or, as a Whitetree Associate (Contractor) to support Whitetree clients and projects.

### Who we are

Whitetree (which includes Whitetree Group Ltd (company number 11365046) and Whitetree Resourcing Ltd (company number 11727311)), whose registered office at One New Street, Wells, Somerset, BA5 2LA ("Whitetree", "we", "us", "our") collects, uses and is responsible for certain personal information about you. When we do so, we are subject to European and UK laws relating to how we hold and process your personal data as defined under the General Data Protection Regulation.

### About Us

Whitetree is a Consulting Company which primarily exists to provide clients with professional management and technical services. We deliver this through staff Consultants permanently employed by us and, Associates (contractors), supplying sub-contract services.

In order to achieve this, we must collect and store candidate data for both permanent careers with Whitetree and for Whitetree Associate Suppliers. We take your privacy very seriously and, for us to keep you informed about relevant opportunities with Whitetree and our Clients, we request to hold your personal data. If you do not allow us to do this, we will be legally obliged to remove you from our database and can no longer consider you for such opportunities.

### This policy explains

- What information we collect during the application process and why we collect it.
- How we use that information.
- How to access and update that information.

### Candidate consent

By ticking the box on the Consent email received you authorise us to hold data about you in a secure CRM system along with notes that will allow us to represent you accordingly. This means we know who you are with contact details, what your requirements are and hold information that we can use to help us consider you for future permanent or contacting opportunities with Whitetree. We will also update our records on you depending on the communications we have with you. This data will be held, whether this is when you are actively seeking a role now or in the future.

### Types of information we collect

This policy covers the information you share with us during the application process including:

- Your name, address, email address, telephone number and other contact information.
- Your CV / resume, cover letter, previous and/or relevant work experience or other experience, education, answers to questionnaires completed or other information you provide to us in support of an application.

- Information from interviews; including video interview footage and phone-screenings you may have, if any.
- Details of the type of employment you are or may be looking for, current and/or desired salary/rates and other terms relating to compensation and benefits packages, willingness to relocate, or other job preferences.
- Details of how you applied for the position you are applying for.
- Any demographic information obtained during the application process such as information about your citizenship and/or nationality.
- Information relating to any previous applications you may have made to Whitetree.

Further information will be collected at the Selection / On-Boarding stages including:

- Reference information and/or information received from background checks (where applicable), including information provided by third parties; and/or
- Bank details required to process payment for invoices received from Associates or candidate expenses.
- Identification documents to demonstrate right to work in the UK.
- Proof of any special qualifications required for the role.
- National Insurance Number.
- The report certificate from any financial or criminal checks required.
- Ltd Company operating and registered address.
- Address details.
- Date of Birth.
- Other information requested on a personal information form including the processing of any financial, security clearance or criminal checks required by your role.

### Special Category Data

It is unlikely we will require or process any data which would be categorised as Special under the General Data Protection Act, but should we need to do so we would contact you and get your explicit consent to do so. This category includes such data as:

- Your racial or ethnic origin.
- Your political opinions.
- Your religious beliefs or other beliefs of a similar nature,
- Whether you are a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992).
- Your physical or mental health or condition.
- Your sexual life.
- The commission or alleged commission by you of any offence, or
- Any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.
- Should you choose to provide any of the above Special Category Data (e.g. on your CV) this will be retained on your original correspondence, but it will not be recorded elsewhere on our systems and will not be used as the basis for any assessment of your suitability.

### How is it collected?

Most of our data comes from job applications for our advertised roles, referrals and the submission of CV's. This normally comes via email to an employee or into our licenced recruitment software, whether from 3rd party websites or from our own. In the case of applications received for a

specifically advertised position we will retain those details whilst considering you for that position. In doing so, we consider that we have a legitimate interest in retaining these details.

For us to keep applicants informed about future relevant opportunities within Whitetree, we need to hold some relevant information about you and for that request your consent.

We also collect data from publicly available databases of candidates who have listed their CV for viewing by agencies and employers or from password protected databases which we subscribe to in order to access candidate data, for which we require consent.

We will not hold your data for any other purpose than assisting you with future career or contracting opportunities. We have never and will never pass your details onto anyone else without your permission and the information is purely held for the purposes of informing you about new opportunities, whether this be now or when you might be looking again in the future.

Where consent has not been given where needed and we are in receipt of data, this will not be used in any way and be deleted from all platforms that they have been received onto, within 30 days.

### How we use information we collect

Your information will be used by Whitetree for the purposes of carrying out the application and recruitment process which includes:

- Assessing your skills, qualifications and interests against our career opportunities and/or Whitetree Client contracts.
- Communications with you about the recruitment process and/or your application(s), including, in appropriate cases, informing you of other potential career opportunities.
- Complying with applicable laws, regulations, legal processes or enforceable governmental requests.
- We will also use your information to protect the rights and property of our users, applicants, candidates, employees or the public as required or permitted by law.
- Verifying your information and carrying out reference checks and/or conducting background checks (where applicable) if you are offered a job.
- If you are offered and accept employment with Whitetree, the information collected during the application and recruitment process may become part of your employment record.

### Automated Decision Making

During our processing of your information we may use functions that could be defined as automated decision making. Typically, this would be where you have submitted a CV/resume to us, and we use an industry standard 3rd party product which uses complex proven semantic and natural language algorithms to “read” and extract data from the submitted document and create a profile for you in our database. This information could later be used to then match your profile against vacancy profiles also stored within our database. Matched profiles are assessed by our staff before we contact you regarding the position to ensure suitability. If you have any questions about this process or to request that we do not use this process during our relationship with you, please contact: [info@whitetree.co](mailto:info@whitetree.co)

### Using your information to keep in touch with you

In addition to our typical processing we may use the information we hold about you in order to contact you in the following circumstances:

- To advise you of changes to our terms.
- To advise you of any security concerns.

- Where permitted by law.

### Who may have access to your information?

- Employees of Whitetree to assess suitability for Whitetree careers and associate opportunities.
- Whitetree Associate information will only be shared with clients with your prior consent, these will include a range of people within the client's organisation who are in a position to make a decision on a candidate's skills and experience.
- It is your responsibility to obtain consent from referees before providing their personal information.
- We may also disclose your personal information to third parties:
  - If we use 3rd parties for running our business processes. An example of this might be that we have our emails, or our database hosted in the cloud. Whilst these cloud providers would not typically have direct access to your information, storage is considered processing under the relevant data protection legislation. Similarly, as an example, if we have employed you directly, we would need to send your data as required by law to local tax authorities.
  - If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
  - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use which includes exchanging information with other companies and organisations for the purposes of fraud protection.
- Whitetree will take appropriate steps to protect information about you that is collected, processed, and stored as part of the application and recruitment process.

### How long do we hold it for?

We will hold your data for no longer than 60 months before seeking confirmation that you are happy for us to continue to hold your data. If you have been engaged as an Associate Supplier with us, we will retain your data for 7 years from the dates of the Consultancy Agreement.

### Secure collection and storing of your information

- All information that you provide to us, or we collect about you is stored on our secure servers. We understand that this includes confidential information and we have put in place a range of suitable physical, electronic and managerial procedures to safeguard and secure your information.
- Our staff have the minimum required access to your data, and are trained to ensure that it is protected, and kept secure.
- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- We do not store your information for longer than is necessary to provide the service, and to ensure that we have appropriate auditable records for business purposes.

### Your rights

We take your rights very seriously and will adhere to the following:

- Your right to be informed of the use of your data.
- Your right of access to your data.
- Your right of rectification of data.
- Your right to erasure of data and be forgotten.
- Your right to restrict our processing of your data.
- Your right for your data to be portable.
- Your right to object at the use of your data.
- Your rights relating to automated decision making and profiling.

If you choose to make a request to us to exercise any of these rights, we will aim to respond to you as soon as we reasonably can but no later than one month. We will not charge a fee for dealing with any reasonable request.

If you are unhappy with how we are using your personal information or if you wish to complain about how we have handled a request, then please contact Kelly McMurray [kelly.mcmurray@whitetree.co](mailto:kelly.mcmurray@whitetree.co) and we will try to resolve your concerns.

You also have the right to complain to your local Data Protection Authority and a full list can be found here [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

The Information Commissioner's Office

Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
Tel. +44 1625 545 700  
email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Website: <https://ico.org.uk>

### Updating your information

Should you wish to update your information, instigate your right to erasure or see what information is held about yourself, you can access the Whitetree Candidate Portal <https://www1.jobdiva.co.uk/portal>. If you originally applied for a role through the Whitetree website, you will have received an email with your username and password.

If you have any problems, please email [info@whitetree.co](mailto:info@whitetree.co) and we will be pleased to assist you.

### Contacting us about your data we hold or our privacy policy

If you want to contact us to discuss how we use or manage your data our main point of contact for Data Protection matters is Kelly McMurray, [kelly.mcmurray@whitetree.co](mailto:kelly.mcmurray@whitetree.co) or write to us at: One New Street, Wells, Somerset, United Kingdom, BA5 2LA.

### Changes to this Policy

We may change this policy from time to time. We will post any changes to this policy in the Candidate Portal found on the careers pages of our website [www.whitetree.co](http://www.whitetree.co)

### Law and Jurisdiction

This privacy information notice is subject to the laws of England, and the non-exclusive jurisdiction of the English Courts. If you are domiciled in Scotland, Wales or Northern Ireland it can be enforced in your local court system.