



CTIL Data Protection Privacy Notice Recruitment
CTIL Document Reference - CTIL-IS-PR-03

Please contact us if you have any questions about this Data Protection Privacy Notice or the information we hold about you.

Email us at gdp@ctil.co.uk or
write to us at The Exchange, Building 1330, Arlington Business Park,
Theale, Berkshire, RG7 4SA.

*** Please note you will need to provide proof of Identity before we can process your request.**



Document History

Revision Date	Version	Changes Made by	Summary of Changes

Approvals

Name	Title	Date	Version
Rhys Phillip	CEO	22/05/2018	1.0

Distribution

Name	Title	Date	Version
ALL CTIL			

References

Reference No.	Title	Date	Version



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Key summary

We process your personal information provided in the course of applying for a job with us in order to carry out our recruitment process and for no other purpose.

We share your information with suppliers who act on our behalf to carry out elements of our recruitment process.

This notice explains what data we process, why we process, how it is legal and your rights.



About us



This privacy notice is provided by Cornerstone Telecommunications Infrastructure Limited ("CTIL")

You should read this privacy notice if you have applied for a job with us

CTIL is, for the purposes of the Data Protection Act 1998 and, after 25th May 2018, the General Data Protection Regulation (EU) 2016/679, your Data Controller. This means that we are responsible for, and control the processing of, your personal information.

We take your privacy very seriously. We ask that you read this privacy notice carefully as it contains important information about our processing and your rights.

If you need extra help

If you would like this notice in another format (for example: audio, large print, braille) please contact us

We have appointed the following Information Officer:

- Name: Sean Sadler
- Address: Building 1330, Arlington Business Park, Theale, Berkshire, United Kingdom, RG7 4SA
- Email: gdpr@ctil.co.uk

How to contact us



Please contact us or our Information Security Officer if you have any questions about this Privacy Notice or the information we hold about you.

If you wish to contact us, please send an email to gdpr@ctil.co.uk or write to us at The Exchange, Building 1330, Arlington Business Park, Theale, Berkshire, RG7 4SA.

Useful words and phrases



Please familiarise yourself with the following words and phrases as they have particular meaning in Data Protection Laws and are used throughout this Privacy Notice:

GDPR	General Data Protection Regulation (EU) 2016/679. This legislation, along with the Data Protection Act 2018, sets out the principles and rules about how companies can process Personal Data and your rights in relation to your data.
Personal Data	Any information from which a <u>living individual</u> can be identified. This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs, voice recordings. It will also include expressions of opinion and indications of intentions about Data Subjects (and their own expressions of opinion/intentions). It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.
Special Categories of Personal Data	any information relating to: <ul style="list-style-type: none"> • Racial or ethnic origin; • Political opinions; • Religious beliefs or beliefs of a similar nature; • Trade union membership; • Physical or mental health or condition; • Sexual life; or • Genetic data or biometric data for the purpose of uniquely identifying you;
Processing	this covers virtually anything anyone can do with Personal Data, including: <ul style="list-style-type: none"> • Obtaining, recording, retrieving, consulting or holding it; • Organising, adapting or altering it; • Disclosing, disseminating or otherwise making it available; and • Aligning, blocking, erasing or destroying it.
Data Subject	The person whom the data is about.
Information Commissioner	The UK Information Commissioner who is responsible for implementing, overseeing and enforcing the Data Protection Laws.
Data Controller	The person who determines the purposes for which, and the manner in which, any Personal Data are processed.
Data Processor	The person who processes the data on behalf of the Data Controller.
Information Security Officer	This is the designated person within CTIL who is responsible for ensuring that the Data Protection Rules are adhered to.
Data Protection Laws	This means the laws which govern the handling of data. This includes the GDPR and the Data Protection Act 2018.

What information do we collect?



➤ Personal information provided by you

The sections below set out the categories of Personal Data we may ask for at each stage of your application for a job with us. Some data may not be required depending on the type of role you are applying for. If you choose not to provide us with any of these categories of information, your application may be rejected or it could affect our ability to process your application.

Recruitment stage	Personal Data	Special Categories of Data
Pre- application	<ul style="list-style-type: none"> • Name • Contact details (address, phone number, email address) 	
If you submit an application or send us a CV	<ul style="list-style-type: none"> • Name • Contact details (address, phone number, email address) • Education • Employment history and references • Professional qualifications • Any other information you include in your application or on your CV 	
Assessment stage	<ul style="list-style-type: none"> • Information may be gathered about you at interview or assessment stage. For example, you might complete written tests, undertake group exercises or take psychometric tests. 	
Conditional offer	<ul style="list-style-type: none"> • Proof of identity • Proof of qualifications • Credit check • Right to work checks 	<ul style="list-style-type: none"> • Right to work for the purpose of preventing illegal working

➤ Personal information provided by third parties

We also receive information about you from other sources, such as your previous employer, HMRC or Data Processers or Data Controllers who provide elements of our recruitment service for us. Further details are set out in the table below:

Personal Data	Special Categories of Personal Data
<ul style="list-style-type: none">• Identity and document verification• Right to work verification• Five year employment history• Credit check and address verification• Professional membership check (if applicable)• Higher education check	Basic DBS check in order to confirm suitability of employment.
<ul style="list-style-type: none">• Information from your previous employers, such as references.	

➤ Personal information about other individuals

If you provide us with information about other individuals (e.g. your next of kin), you confirm that you have informed the relevant individuals accordingly.

Why we process your personal data



We use your Personal Data for the following purposes listed in this section and table below.

Type of data	Why do we need it?
Contact details (name, email address, telephone number, home address)	So that we can contact you about your application for a job with us.
Education and employment history, and proof of qualifications	So that we can assess your relevant experience and suitability for a job with us, and assess what your training needs would be if you started working for us.
Information provided by professional and personal referees	So that we can assess your relevant experience and suitability for a job with us.
Information generated during the recruitment process itself (such as interview notes, psychometric test results and your answers to assessment questions)	So that we can assess your relevant experience and suitability for a job with us. Psychometric tests help us understand your working-style preferences; these will be discussed during interview and the result from psychometric assessments alone would not exclude a candidate from a recruitment process.
Information provided by credit reference agencies	So that we can assess suitability for senior roles or roles involving financial duties.

Special Categories of Personal Data

Type of data	Why do we need it?
Identity documents such as a copy of your passport (including information about your national origin) or other right to work documentation	So that we can comply with our obligation to check that our employees have the right to work in the UK.
Information about a disability which may affect the application process.	To make reasonable adjustments to our application process for your disability.

How long do we keep your data?



If your application for a job with us is unsuccessful or you do not accept our offer of employment, then we will delete all of the Personal Data gathered during the recruitment exercise [six months] after the relevant recruitment exercise has ended. This is so that we can:

- (a) Identify candidates who apply for multiple roles with us within that timeframe; and
- (b) Defend any legal claims arising from the recruitment process.

If you ask us to do so, we will keep the details of your application for a further six months beyond our normal retention period, so that we can proactively contact you should any further potentially suitable vacancies arise.

If your application for a job with us is successful and you start work as our employee, please see the **Staff Privacy Notice** for details of how long we will retain the data gathered during the recruitment exercise. If you apply for a new role with us when you are already our employee, this privacy notice applies in respect of any new information gathered during that application process, and the Staff privacy notice continues to apply in respect of any information we already hold by virtue of you being a current employee.



How is processing your personal data lawful?

We are allowed to process your Personal Data for the following reasons and on the following legal bases:

- **Legal obligation**
 - It is necessary for the purpose of compliance with certain legal obligations that are imposed on us when recruiting staff.

- **Legitimate interest**
 - We have a legitimate interest in processing your data, having considered the impact of processing on your interests and rights, and having ensured appropriate safeguards are in place to minimise any intrusion on your privacy. Some of the legitimate interests for which we process your Personal Data are:
 - running an effective and fair recruitment processes;
 - establishing and defending our legal rights; and
 - ensuring effective general HR and business administration.

Special Categories of Personal Data

We will only process Special Categories of Personal Data for the following reasons and subject to the following exceptions.

- **Employment**
 - We may be required to process Special Categories of Personal Data for compliance with our obligations under employment law.

- **Manifestly public Personal Data**
 - We may process Special Categories of Personal Data if you have made it public, for example, information made public on a public social media platform.

- **Health purposes**
 - We may process information about your health in order to assess your medical capacity to perform the job you have applied for.

How we keep your data secure



We use technical and organisational measures to safeguard your Personal Data.

We have up-to-date technical security measures and security policies. These ensure that we follow good practices across our business, and we require the same of our suppliers. We aim to keep your information safe from external threats such as hackers and malicious software and internal threats such as failures to patch software and lack of information management.

If you have any particular concerns about your information, please contact us (see 'How you can contact us?' above).

Who will have access to your personal data?

We may disclose your Personal Data to third parties who provide certain recruitment services for us, including:

Personal Data	Who information is shared with
Your name and contact details for the purpose of access to online assessments used as part of our recruitment process	Our online assessments provider (currently Talent Q)
If you were placed with us by a recruitment firm, your name, CV and contact information may be contained on a cloud-based system or shared over email, for the purpose of managing our relationship with them.	Recruitment agencies (including preferred suppliers such as Project People) Stored in Applicant Tracker System (currently Bullhorn)
Pre-employment information including your CV, employment history, a copy of your passport or other identification documents, right to work information, training history, credit check information, professional membership details and bank statements	Our pre-employment screening provider (currently Agenda)

Your rights



As a data subject, you have the following rights under the Data Protection Laws:

- The right of access to Personal Data relating to you
- The right to correct any mistakes in your information
- The right to restrict or prevent your Personal Data being processed
- The right to have your Personal Data ported to another Data Controller (not relevant here).
- The right to erasure of your Personal Data
- The right to object to our processing

These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your Personal Data, please contact us using the details in “**How to contact us**”. We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months. There are exemptions to many of these rights which we will apply in accordance with the law.

➤ **Right to access Personal Data relating to you**

You may ask to see what Personal Data we hold about you and be provided with:

- A copy;
- Details of the purpose for which it is being or is to be processed;
- Details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- The period for which it is held (or the criteria we use to determine how long it is held);
- Any information available about the source of that data; and
- Whether we carry out any automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

Requests for your Personal Data must be made to gdpr@ctil.co.uk in writing

To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

➤ **Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold, free of charge. If you would like to do this, please:

- Email, call or write to us (see 'How can you contact us?' above)
- Let us have enough information to identify you (e.g. account number, user name, registration details), and
- Let us know the information that is incorrect and what it should be replaced with.

➤ **Right to prevent processing of Personal Data**

You may request that we stop processing your Personal Data temporarily if:

- You do not think that your data is accurate. We will start processing again once we have checked whether or not it is accurate;
- The processing is unlawful but you do not want us to erase your data;
- We no longer need the Personal Data for our processing, but you need the data to establish, exercise or defend legal claims; or
- You have objected to processing because you believe that your interests should override CTIL's legitimate interests.

➤ **Right to erasure**

You can ask us to erase your Personal Data where:

- You do not believe that we need your data in order to process it for the purposes set out in this privacy notice;
- You object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or
- Your data has been processed unlawfully or have not been erased when it should have been.



➤ **What will happen if your rights are breached?**

You may be entitled to compensation for damage caused by contravention of the Data Protection Laws.

➤ **Complaints to the regulator**

It is important that you ensure you have read this privacy notice - and if you do not think that we have processed your data in accordance with this notice - you should let us know as soon as possible. Similarly, you may complain to the Information Commissioner's Office. Information about how to do this is available on his website at www.ico.org.uk.

Other information



Changes to the Privacy Notice

We might change this privacy notice from time to time, and if we do we will provide you with notice by email of any forthcoming changes.