



## **Polyco Healthline Data Privacy Policy (Recruitment)**

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### **1. Introduction**

Polyco Healthline is committed to protecting the privacy and security of your personal information. This notice explains what personal data (information) we hold about you, how we collect it, and how we use and share information about you during your employment and after it ends. We are required to notify you of this information in accordance with the European General Data Protection Regulation (GDPR). Please ensure that you read this privacy notice we may provide to you from time to time when we collect or process personal information about you. This policy may be updated to reflect future changes in legislation.

### **2. Who collects the information**

Polyco Healthline collect and process certain information about you as part of the recruitment process and is the data controller.

This information may also be used by our subsidiary companies, being BM Polyco, HPC Healthline and Brosch Direct. For the avoidance of doubt any reference to “we”, “us” or “our” in this policy refers to the group of companies as a whole.

### **3. Data protection principles**

We will comply with the data protection principles when gathering and using personal information.

### **4. About the information we collect and hold**

#### **4.1 Types of Information**

We may collect the following information during the recruitment process:

- Your name, gender and contact details (i.e. address, home and mobile phone numbers, email address);
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers\*;
- Information regarding your academic and professional qualifications\*;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information\*;
- Information regarding any criminal record/unspent convictions;
- Your racial or ethnic origin;
- Details of your referees.



- A copy of your driving licence.

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '\*' above to us to enable us to verify your right to work and suitability for the position. A copy of your driving licence may be required for certain positions.

#### **4.2 How we collect the information**

We may collect this information from you, your referees (details of whom you will have provided), your education provider, the relevant professional body or the Home Office.

#### **4.3 Why we collect the information and how we use it**

We will typically collect and use this information for the following purposes:

- to enter into a contract;
- for compliance with a legal obligation
- for the performance of a task carried out in the public interest; and
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

#### **Sensitive Data**

Some of your particularly sensitive personal data will fall within 'special categories', for example information related to your racial or ethnic origin. We will not use this information to make recruitment decisions but we may process special categories of personal information in the following circumstances:

- a. In limited circumstances, with your explicit written consent.
- b. Where we need to carry out our legal obligations or exercise rights in relation to your employment with us and in line with our Data Protection Policy.
- c. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our Data Protection Policy.
- d. We may also process this of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

Please note that some of these grounds may overlap and there may be several grounds which justify our use of your personal information.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

#### **Criminal Convictions**

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect this information as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences to consider if the



conviction puts other members of staff and the public at risk or to evaluate suitability for certain job types e.g. finance staff.

We are allowed to use your personal information in this way to carry out our obligations as an Employer.

#### **4.4 Sharing Information**

We sometimes use third parties to process data on our behalf for the purposes described above. Such processing will only take place within the boundaries of the European Economic Area.

We may need to share some of your personal information with other third parties, such as external contractors and our professional advisers and with potential purchasers of some or all of our business or on a re-structuring of the business. Where possible this information will be anonymised.

We do not allow third party providers to use your data for their own purposes and they will process your information only in accordance with our instruction.

#### **4.5 How long we keep your information**

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. If you need further information on this, refer to our Data Privacy Policy (Employees) and our Data

#### **4.6 Your rights to your information**

It is important that the personal information we hold about you is accurate and current. You have a duty to inform us if there are any changes to your personal information.

You also have other rights regarding your personal data which include your rights to:

- a. Make a 'Subject Access Request' – you may request access to your personal information and to check it is being lawfully processed. See our Subject Access Policy and Form for more details.
- b. Request correction of the personal information that we hold for you.
- c. Request erasure of your personal information.
- d. Object to processing – where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- e. Request the restriction of processing of your information e.g. whilst we check its accuracy
- f. Request the transfer of your personal information to another party.



In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you wish to exercise any of your rights as described, you should speak to your recruitment contact. If you request that we provide information we hold on you, we will not charge you to provide this. We will require specific information to help us confirm your identity to ensure that the person requesting the information has a right to it.

#### **4.7 Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality

Where your information is shared with third parties we carry out due diligence to ensure that your information will be processed in a secure manner and treated in accordance with the law.

#### **5. Further Information**

If you have any questions or concerns about this policy, you should speak to your recruitment contact or email [gdpr.compliance@polycohealthline.com](mailto:gdpr.compliance@polycohealthline.com).

You also have the right to complain to the relevant supervisory authority. If you wish to raise a complaint in the UK about the way we handle your data, you should contact the Information Commissioners Office. Details on how to contact them are available at <https://ico.org.uk>.