

## **Devonshire Group Privacy Notice - Recruitment**

Data controller:       The Devonshire Group (referred to as 'we' below)  
The Estate Office  
Bakewell  
Derbyshire  
DE45 1PJ

As part of any recruitment process, we collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

### **What information do we collect?**

We collect 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
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief (this information is held and processed anonymously).

We collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, or collected through online applications, interviews or other forms of assessment.

We will also collect personal data about you from third parties. This could be from recruitment agencies to which you have submitted an application and given permission to pass on to us. Or it could be references supplied by former employers and information from criminal records checks - we will seek this information only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### **Why do we process personal data?**

We need to process data to fulfil the requirements of the recruitment process. 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, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

We have 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.

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 workers and have concluded that they are not.

We 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.

For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

### **Who has access to data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We 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 for you and the Disclosure and Barring Service to obtain necessary criminal records checks, if that is a requirement of the role.

We will not transfer your data outside the European Economic Area.

### **How do we protect data?**

We take 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. Details of these policies and controls are outlined in the employee handbook or are available from the HR department at the address above or [HR@chatsworth.org](mailto:HR@chatsworth.org).

### **For how long do we keep data?**

If your application for employment is unsuccessful, we will hold your data on file for no longer than twelve months after the end of the relevant recruitment process. At the end of that period your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held are available in our data retention policy.

### **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 are relying on our legitimate interests as the legal ground for processing
- 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 our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the HR department at the address above or [HR@chatsworth.org](mailto:HR@chatsworth.org). You can make a subject access request by completing the relevant form (available from HR department).

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to us 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**

Recruitment processes are not based solely on automated decision-making.

May 2018