

# Data Protection Privacy Notice (recruitment)



## Personal Information

Greentown Traffic Management Limited (“GTM” or “we”) is committed to protecting the privacy and security of your personal information.

This Data Protection Notice (“Notice”) describes how and why GTM, and/or on its behalf by its third-party service providers, collects and processes personal information relating to you (“Personal Data”) for the purposes of the recruitment process. GTM processes personal data in accordance with the UK General Data Protection Regulation (“UK GDPR”) tailored by the Data Protection Act 2018 and will act in accordance with any relevant data protection legislation in force from time to time.

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a ‘privacy notice’).

## What is Personal Data?

“Personal Data” or personal information, means any information relating to a natural person who can be identified or is identifiable, directly or indirectly. It does not include data where the identity has been removed (anonymous data). There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person’s health or criminal record.

## Who collects the information?

GTM is a ‘data controller’ and gathers and uses certain information about you for recruitment purposes. Our registered office at 63 Marble Arch Road, Florencecourt, Co. Fermanagh, BT92 1DE. This means that we are responsible for deciding how we hold and use personal information about you.

## Data protection principles

We will comply with data protection law. This says that the Personal Data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## About the information we collect and hold

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We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name 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;
- Your community background and gender;
- Information regarding your criminal record;
- Details of your referees.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- 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
- Information regarding your criminal record, including criminal records certificates and enhanced criminal records certificates where it is essential to the role applied for.
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information
- A copy of your driving licence
- Information concerning your health

You are required (by law or in order to enter into a contract of employment) to provide the information above to us to enable us to verify your right to work, suitability for the position and for monitoring purposes as required by the Equality Commission for Northern Ireland.

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

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

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

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

- to take steps to enter into a contract (e.g. an employment contract);
- for compliance with a legal obligation (e.g. our obligation to check that you are eligible to work in the United Kingdom); and

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- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

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.

### **How we may share the information**

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law (such as monitoring information as required by the Equality Commission for Northern Ireland).

### **Where information may be held**

Information may be held at our offices and third-party agencies, service providers, representatives and agents as described above.

### **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, disability, age, sexual orientation, religious belief/political opinion or sex discrimination. We also hold information for Equality Commission reporting purposes and to align with Equality Commission best practice guidance, after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than this we may do so but will first consider whether the records can be pseudonymised and the further length of time required.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

Further details on our approach to information retention and destruction are available in our Data Retention Schedule contained in our Data Retention Policy that gives these details. For more information please contact Pamela Crozier, HR Manager, at Florencecourt Head Office, 63 Marble Arch Road, Florencecourt, Co Fermanagh, BT92 1DE.

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### Your rights to correct and access your information and to ask for it to be erased

We set out below the rights which you have in relation to our processing of your Personal Data. Note that these rights are not absolute and are subject to limitations under law. You have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal data ('right to be forgotten')**. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, performance of a contract or where necessary to retain information in relation to a legal claim.
- **Object to processing of your personal data.** In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which may override your rights and freedoms. We may continue to process your Personal Data if we (or a third party) have compelling legitimate grounds to process your Personal Data which, on balance, overrides your rights or if we require your Personal Data in relation to a legal claim.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in certain circumstances.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format where this is technically feasible. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. In the limited circumstances where you may 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. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent we may not be able to continue with the recruitment process.

Please contact Pamela Crozier, HR Manager, for details of how to correct, erase or request your personal data or if you have any questions about this notice.

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### 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.

We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioner's Office of a suspected data security breach where we are legally required to do so.

### How to complain

We hope that we can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at the address below for further information about your rights and how to make a formal complaint:

The Information Commissioner's Office – Northern Ireland

3rd Floor

14 Cromac Place,

Belfast

BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)