



Job Applicant Privacy Notice

27 March 2019

PRIVATE & CONFIDENTIAL

i. Document Confidentiality Statement

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ii. Document Review

Review Date	Version	Role of Reviewer	Reviewer
25.05.2018	0.0.1	People Operations Manager	Taz Mukhtar
13.06.2018	0.0.1	Chief People Officer	Dan Atkinson
26.03.2019	0.0.2	Chief People Officer	Dan Atkinson

Document Approval

Date of Approval	Version	Role of Approver	Approver
xx.xx.2018	0.0.1	ExCo	ExCo
26.03.2019	0.0.2	ExCo	ExCo

Job Applicant Privacy Notice

Purpose

This notice and is designed to give job applicants information about how their personal data will be used.

Data Controller: Tandem Money Limited

Data Protection Officer: Dan Atkinson

General Principles

As part of any recruitment process, Tandem collects and processes personal data relating to job applicants. Tandem is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does Tandem collect?

Tandem collects 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 the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

Tandem collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Tandem will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. Tandem will seek information from third parties only once a job offer to you has been made and will inform you that it is 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 does Tandem process personal data?

Tandem needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, Tandem needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

Tandem has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability

for employment and decide to whom to offer a job. Tandem may also need to process data from job applicants to respond to and defend against legal claims.

Where Tandem relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Tandem processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where Tandem processes other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time.

For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, the organisation will keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

Who has access to the data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes People 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.

Tandem shares your data with third parties in order to manage the application and on boarding process for successful applicants.

Some of our suppliers who process your data in accordance with this Privacy Policy may be outside the UK and the European Economic Area (“EEA”). When they do, we will have a contract in place to make sure the recipient protects the data to the same standard as is required in the EEA.

How does Tandem protect data?

Tandem takes the security of your data seriously. Tandem has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where Tandem engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

How long does Tandem keep data?

If your application for employment is unsuccessful, Tandem will hold your data on file for up to 6 months after the end of the relevant recruitment process. If you agree to allow the Tandem to keep your personal data on file, Tandem will hold your data on file for a further 1 year for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, 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 will be provided to you in a new privacy notice.

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 the organisation to change incorrect or incomplete data;
- require the organisation 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 the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.
- request the transfer of your data to another party.

If you would like to exercise any of these rights, please contact DPO@tandem.co.uk.

If you believe that Tandem has 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 Tandem during the recruitment process. However, if you do not provide the information, Tandem may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Automated decision-making

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

Further Information

Tandem will review policies and procedures periodically to reflect changes in legislation, good practice etc.

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