

Job Applicant Privacy Notice

Page 1 of 5

Introduction

- References in this notice to the "organisation" are references to dnata UK Limited, registered office: Unit 3, Northumberland Close, Stanwell, Middlesex, TW19 7LN.
- The organisation is committed to all aspects of data protection and takes seriously its duties and the duties of its employees under Data Protection Law. This policy sets out the rules regarding data protection in relation to personal data that is provided by individuals who apply to the organisation for employment. It sets out details of the organisation's obligations and rights that job applicants have in relation to their personal data.
- The organisation is the data controller. This means that the organisation is responsible for deciding how it holds and uses personal information about job applicants. The organisation is required under Data Protection Law to notify all job applicants of the information set out in this privacy notice.

Data Privacy Manager

- Simon Pinnock is the organisation's data privacy manager (DPM) and is responsible for adherence to this policy. If there are any questions regarding this policy, they should be directed to GDPR@dnata.co.uk. If an individual becomes aware of a data breach they should report it to Simon Pinnock immediately on 01753 561421.

Definitions of data protection terms

- "Data Protection Law" - Data Protection Law refers to the Data Protection Act 1998 (as amended) and, on and from 25 May 2018, the General Data Protection Regulation.
- "Processing" - For the purposes of this policy, "processing" includes any activity that involves use of personal data. It includes obtaining, recording or holding personal data, or carrying out any operation or set of operations on the personal data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
- "Personal data" - Information is "personal data" if it identifies or could identify a living person, whether by itself, or when combined together with other information in the organisation's possession (for instance such as names and contact details etc.).

What is the purpose of this document?

- As data controller, the organisation is responsible for deciding how it holds and uses personal information about job applicants. All job applicants are sent a copy of this privacy notice as they are applying for work with the organisation. The notice is to inform all job applicants how and why personal data will be used, which principally is in relation to the recruitment exercise, and how long that data will be retained for. It provides job applicants with certain information that must be provided under Data Protection Law.



Data protection principles

- ✔ The organisation will comply with Data Protection Law and principles which means that your data will be:-
 - ✔ used lawfully, fairly and in a transparent way;
 - ✔ collected only for valid purposes that the organisation have clearly explained to individuals and not used in any way that is incompatible with these purposes;
 - ✔ relevant to the purposes the organisation has informed job applicants about and limited only to those purposes;
 - ✔ accurate and kept up to date;
 - ✔ kept only as long as necessary for the purposes the organisation has informed job applicants about; and
 - ✔ kept securely.

The type of information held

- ✔ Any job applicants applying to the organisation for work or employment will need to provide a range of personal data which will include the following:-
 - ✔ information provided in a curriculum vitae and covering letter;
 - ✔ information provided on an application form includes, however is not limited to, name, address, telephone number, personal email address, employment history and qualifications;
 - ✔ any information provided to the organisation during any interview; and
 - ✔ information about job applicants' entitlement to work in the UK;
- ✔ The organisation may also collect, store and use the following "special categories", of more sensitive personal information:-
 - ✔ information about health, including any medical condition; and
 - ✔ information about criminal convictions and offences.

How is personal information collected?

- ✔ The organisation will collect personal information about job applicants from the following sources:-
 - ✔ directly from the job applicant through their CV, application form, covering letter and interview;
 - ✔ any recruitment agency used by the organisation for the purposes of recruitment;
 - ✔ referees named by the job applicant;
 - ✔ in the event an offer of employment is made:
 - ✔ the applicant will apply to Disclosure and Barring Service to obtain details in respect of any criminal convictions; and



- the applicant will undertake a 5 year employment check by completing a referencing pack for completion by the third party referencing agency currently in use.

How information will be used

- The organisation will use personal information provided by job applicants to:-
 - assess the skills, qualifications and suitability for the role;
 - carry out background and reference checks where these are applicable;
 - communicate with job applicants about the recruitment process;
 - retain records relating to the organisation's recruitment processes; and
 - comply with legal and regulatory requirements.
- The organisation has a legitimate interest to decide whether to appoint particular job applicants to specific roles and to assess and confirm a job applicant's suitability for employment. The organisation also needs to process personal information from job applicants to decide whether to enter into a contract of employment with the individual.
- As such, the organisation will need to process personal data provided by job applicants to decide whether they meet the basic requirements in order to be shortlisted for interview. The organisation will use the information provided on the application form, and/or CV, to invite a job applicant for an interview and in the event an offer of employment is made.
- If a decision is taken to offer employment, then the organisation will carry out applicable criminal record and reference checks, in accordance with the Company's Security Policy and Procedure, before confirming any appointment.
- If a job applicant fails to provide information requested, which is necessary for the organisation to consider any application, the organisation is unlikely to be able to process any application successfully.
- The organisation will not use personal data of any job applicant for any purpose other than the recruitment exercise for which a job applicant has applied.

How particularly sensitive personal information is used

- The organisation will use particularly sensitive personal information in the following ways:-
 - Information about your health and disability status will be used to consider whether the organisation needs to provide appropriate adjustments during the recruitment process for a particular job applicant. The organisation will process such information to comply with its legal obligations and exercise specific rights in relation to employment.

Information about criminal convictions

- The organisation will only collect information about criminal convictions if it is appropriate given the nature of the role and where the organisation is legally able to do so. Where appropriate, the organisation will collect information about criminal convictions as part of the recruitment process.



The organisation will use information about criminal convictions and offences in the following ways:-

- ✔ To assess suitability for particular roles where a criminal convictions check is required under the CAA Regulations for roles where airside passes are required or where individuals are otherwise working in regulated buildings or otherwise in accordance with the organisation's Security Policy and Procedure; and
- ✔ The organisation has in place an appropriate policy document and safeguards which are required by law to maintain when processing such data.

Who has access to data

- ✔ Personal data provided by job applicants may be shared internally for the purposes of the recruitment exercise. This will include members of the HR and Recruitment Teams, those who are engaged in interviewing job applicants and also Managers who work in the business area where the appointed job applicant will be working.
- ✔ The organisation will not share data from job applicants with third parties unless their application for employment is successful and an offer of employment is made. In such circumstances, the organisation will then share your data with your named referees for the purposes of applying for references. These include:
 - ✔ Current external referencing agency and airport authorities.

Data security

- ✔ The organisation has put in place appropriate security measures to prevent personal information of job applicants from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to personal data from job applicants is limited to the organisation's employees [and third parties listed above] who are involved in the recruitment process. Such personal data will only be processed in accordance with the recruitment process and all employees are subject to a duty of confidentiality.
- ✔ The organisation also has procedures in place to deal with any suspected data security breach and will notify job applicants and the appropriate regulator of any suspected breach where the organisation is legally required to do so.

Data retention

- ✔ In the event of an applicant not being shortlisted for interview, the organisation will retain the personal information, as outlined above in 'The type of information held', for a period of no more than 3 months.
- ✔ In the event of an unsuccessful application, the organisation will retain personal information for a period of no more than 6 months after the organisation has communicated to the job applicant the decision not to take their application forward. The organisation retains that personal data for that period in order to respond to and defend any claim made by job applicants and to demonstrate that the recruitment exercise has been conducted in a fair and transparent way and in accordance with



our procedures. After that period, all personal information from unsuccessful job applicants will be securely destroyed in accordance with our Data Protection Policy and Privacy Notice.

- ✔ In the event that an application for employment is successful, personal data from job applicants obtained during the recruitment process will be transferred to the individual's personnel file and retained during their employment. Information can be obtained in the company's Data Protection Policy and Privacy Notice.

Rights of data subjects

- ✔ In certain circumstances, under Data Protection Law, job applicants have the following rights:-
 - ✔ Request access to their personal information which enables job applicants to receive a copy of the personal information held by the organisation and to check that it is being lawfully processed;
 - ✔ Request corrections of personal information that the organisation holds. This enables job applicants to have any incomplete or inaccurate information held about them corrected;
 - ✔ Request erasure of personal information. This enables job applicants to ask the organisation to delete or remove personal information where there is no good reason for the organisation continuing to process it;
 - ✔ Object to processing of personal information where the organisation is relying on a legitimate interest and there is something about a job applicant's particular situation which gives rise to an objection to processing on this ground;
 - ✔ Request the restriction of processing of personal information. This enables job applicants to ask the organisation to suspend the processing of personal information, for example if the job applicant wants to establish the accuracy or reason for processing such information;
 - ✔ Request the transfer of personal information to another party.

Right to withdraw consent

- ✔ In the limited circumstances where a job applicant has provided their consent to the collection, processing and transfer of personal data for the recruitment exercise, job applicants have the right to withdraw their consent for that specific processing at any time. To withdraw consent, job applicants should contact GDPR@dnata.co.uk. Once notification is received that consent has been withdrawn, the organisation will no longer process personal information for the purpose or purposes that the job applicant originally agreed to unless the organisation has another legitimate basis for doing so in law.
- ✔ If a job applicant wishes to review, verify, correct or request erasure of their personal information or object to the processing of personal data or request the transfer of that personal data to another party, please contact GDPR@dnata.co.uk.