

Applicant Privacy Notice - General System / Excession

Version: 2.0

Last Updated: June 2022

About Us

General System is the collective trading name of the following companies registered in England and Wales: General System Group Limited (Company Number 13920622), General System Corporation Limited (Company Number 14122783) and Excession Technologies Limited (Company Number 10098147) whose registered offices are at 11 Leadenhall Street, London EC3V 1LP.

General System Corporation Limited and Excession Technologies Limited are the data controllers in respect of your personal data. This means that we are responsible for deciding how we hold and use personal data about you.

What is the purpose of this document?

General System / Excession ('we' / 'our' / 'us') are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information when you are applying for a working relationship with us, in accordance with the UK GDPR and the Data Protection Act 2018.

This notice applies to all prospective employees, workers and contractors, including consultants and interns. If you are successful in your application to work with us, we will supply you with a staff privacy notice when you start work.

We are a **data controller**. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection Principles

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

1. used lawfully, fairly and in a transparent way;
2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
3. relevant to the purposes we have told you about and limited only to those purposes;

4. accurate and kept up to date;
5. kept only as long as necessary for the purposes we have told you about; and
6. kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are **special categories** of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

1. Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
2. Date of birth
3. Gender
4. Recruitment information (including notes taken during interviews and assessments, copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)

We may also collect, store and use the following **special categories** of more sensitive personal information:

1. Information about your race or ethnicity, religious beliefs, sexual orientation or political opinions.
2. Information about your health, including any medical condition, health and sickness records.

How is your personal information collected?

We collect personal information about prospective employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

How we will use information about you

We will only use your personal information when the law allows us to. We will use your personal information in the following circumstances:

1. where we need to comply with a legal obligation; or
2. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or

3. if you are offered a role with us, where we need to perform the contract we have entered into with you in advance of you starting work for us.

We may also use your personal information in the following circumstances, which are likely to be rare:

1. where we need to protect your interests (or someone else's interests); or
2. where it is needed in the public interest.

2. Situations in which we will use your personal information

We need the information in the list above primarily to allow us to pursue our legitimate interests in recruiting staff and to enable us to comply with legal obligations. In some cases we may use your personal information where it is necessary for our other legitimate interests or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

1. Making a decision about your recruitment or appointment and to make onboarding arrangements for you
2. Determining the terms on which you work for us
3. Checking you are legally entitled to work in the UK
4. Making arrangements for providing the following benefits to you: workplace nursery scheme
5. Liaising with your future pension provider
6. Administering the contract we have entered into with you
7. Business management and planning, including accounting and auditing
8. Assessing qualifications for a particular job or task, including decisions about promotions
9. Education, training and development requirements
10. Ascertaining your fitness to work
11. Complying with health and safety obligations
12. To prevent fraud
13. Equal opportunities monitoring

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to progress your application, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. in limited circumstances, with your explicit written consent;
2. where we need to carry out our legal obligations or exercise rights in relation to your prospective employment with us (please see below). We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data; and
3. where it is needed in the public interest, such as for equal opportunities monitoring (please see below). Again, we have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type 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.

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, and to administer benefits.

We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Do we need your consent?

We do not need your consent if we use your particularly sensitive personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may ask you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so, for example where it is necessary to carry out our legal obligations. We may receive and use information about criminal convictions as part of our recruitment processes.

Data sharing

We may have to share your data with third parties, including third-party service providers, for example our payroll provider and benefits providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and EEA. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

The following activities are carried out by third-party service providers (including contractors and designated agents): payroll, background checks, HR data storage, pension administration, and benefits provision and administration. It may be necessary to transfer data to these providers as part of the onboarding process prior to you starting work with us.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures are available upon request.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process

your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We will deal with any suspected data security breach promptly and effectively, and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from our Data Protection Officer. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

1. Request access to your personal information (commonly known as a **data subject access request**). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
4. Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

5. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

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 at any time. To withdraw your consent, please contact the Data Protection Officer. 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 lawful basis for doing so.

Data protection officer (DPO)

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at dpo@excession.co. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates, if your application to us is still pending at the time. We may also notify you in other ways from time to time about the processing of your personal information.

Acknowledgment of receipt

I, _____ (applicant name), acknowledge that on _____ (date) I have received a copy of the General System / Excession Privacy Notice for Applicants and that I have read and understood it.

Signature

.....