



## **RECRUITMENT: PRIVACY NOTICE**

East of England Co-operative Society Limited (registered office: Wherstead Park, Wherstead, Suffolk, IP9 2BJ), and its subsidiaries and affiliates (collectively, the Society) cares about your privacy and is committed to processing your personal information in accordance with fair information practices and applicable data privacy laws.

### **Scope**

This notice explains how the Society handles the personal information of individuals who make an application to be considered for employment (or for an alternative position) with the Society. We may amend this notice from time to time, should it become necessary to do so. This notice may also be supplemented by other statements as needed to comply with legal requirements and colleagues' representation agreements, such as the Colleague Privacy statement (applicable once an employment relationship has been entered into) available on the Society's internal portal site.

### **Collection and Use of Personal Information**

We may collect, use and transfer your personal information through electronic and/or paper-based data processing systems for the legitimate business purpose to assess your suitability for employment with Society and to help us administer your potential employment relationship with the Society. This may be undertaken in conjunction with third party providers who provide certain parts of our employment / recruitment services for us and act as a Data Processor. We have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do so. This will include information you provide when you apply to us and any additional information provided by you or others in various ways including:

- Emails, letters and application forms (paper or on-line);
- Immigration, Right to Work and residence status;
- Personal identification information, such as your name , home address and contact details; and
- Educational and training information, such as your educational awards, certificates. Licences, vocational records.

In addition, we may process sensitive personal information, including information relating to your health, if required as part of any recruitment & selection process, or if it is required to comply with applicable law. Sensitive personal information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place and after having first obtained your consent, if required by law.

The majority of this information will play not part in the selection process and it will only be used to assist with equal opportunities monitoring. For certain roles with the Society we will, however, consider information relating to your financial history and criminal convictions/prosecutions in deciding whether to proceed with your application and/or continue with any offer of employment. We will require your permission before any financial or criminal checks are undertaken.

When you apply for a role with the society, we may request some diversity information. If provided, your diversity information will be treated as confidential, will be held separately, and will play no part in the recruitment process.

During the recruitment process we may research comments and opinions made public on social networking sites such as LinkedIn, Facebook or Twitter etc.

When you apply for a position the Society may use an automated process as part of decision making. If you submit an application and it is declined through this automated process, you can contact us within 21 days to have the decision reconsidered. You also have the right to

ask that the decision is not made based solely using an automated process.

## **Disclosures**

We may disclose your personal information for legitimate recruitment & selection purposes in the following circumstances to:

- Disclosure & Barring Service (DBS) or Experian who administer DBS checks on our behalf. This is only for successful applicants, to roles which we have identified as appropriate to undertake DBS checks as part of the recruitment & selection process. The Disclosure & Barring Service or Experian will reference the details provided on the relevant form by the Society and yourself to government and law enforcement bodies in accordance with any relevant legislation. The details provided to these bodies will be used for identifying possible matches to records held by them. Where such a match is established, data may be released to the Disclosure & Barring Service or Experian for inclusion on any certificate issued.
- DriveTech (UK Limited) who administer driving licence checks on our behalf. This is only for successful applicants, to those roles which we have identified as appropriate to undertake Driving Licence checks as part of the recruitment & selection process. DriveTech will reference the details provided on the relevant form by the Society and yourself to obtain a record of your driving licence including classification and any associated endorsements.
- To the relevant Local Authority who will assess applications for Personal Licences and / or Designated Premises Supervisors (DPS) to sell or authorise the sale of alcohol at our establishments. This is only for successful applicants, to those roles which we have identified as requiring a personal licence for the sale of alcohol. The Local Authority will reference the details provided on the relevant form by the Society and yourself to determine whether to grant the licence. Part of this process will also include a DBS check as detailed above.

- Some roles may require specific checks with professional / regulatory bodies to ascertain qualifications, their 'licence to operate' in their relevant professional field. Candidates will be made aware of what checks will be undertaken as relevant to the position being applied for.
- To third parties as part of our referencing process. As part of our recruitment process we may ask candidates to provide details of the previous employment and academic history. This information provides us with an explanation of the candidates past work experience, including details of any gaps or period of unemployment and academic background and may be used to obtain references. If you provide details of a referee it is your responsibility to ensure that the referee is aware that you have forwarded their details and happy for you to do so. Since individuals have a right under the Data Protection legislation to see their personal data, and reference provided to us form part of the set of personal data, we cannot guarantee the complete confidentiality of any referee.

### **Choice**

We respect your right to object to any uses or disclosures of your personal information that are not (i) required by law, (ii) necessary for the fulfilment of a contractual obligation (e.g., employment contract), or (iii) required to meet a legitimate need of the Society as an employer / potential employer (such as disclosures for internal auditing and reporting purposes or other processing covered by this notice). If you do object, we will work with you to find a reasonable accommodation.

### **International Transfers**

Your personal information may be transferred outside the EEA and where such transfers occur, we will assure that adequate protection exists either through appropriate contractual arrangements or as required by law.

### **Accuracy**

We take reasonable steps to ensure that personal information is accurate, complete, and current and you have a right to rectification or erasure of your personal data, to restrict

processing or to object to processing in certain circumstances. Please notify the Recruitment /Human Resources team (at [peopleteam@eastofengland.coop](mailto:peopleteam@eastofengland.coop) ) of any changes to your personal information during the application / recruitment process.

### **Access**

You may reasonably access and update the personal information pertaining to you that the Society holds. You can exercise this right by contacting the Recruitment /Human Resources team (at [peopleteam@eastofengland.coop](mailto:peopleteam@eastofengland.coop)). Please note that:

- Your ability to access and correct personal information is not limited by transfers of personal information – the ability shall exist regardless of where personal information is physically situated within the society.
- Your right to access your personal information may have some restrictions. For example, access may be denied (i) in the case of recurrent access requests within a short time interval, or (ii) where providing such access or correction could compromise the privacy of another person or unreasonably expose sensitive business information.

### **Security**

The Society takes precautions to protect personal information from loss, misuse, and unauthorised access, disclosure, alteration, and destruction. We have taken appropriate technical and organisational measures to protect the information systems on which your personal information is stored and we require our suppliers and service providers to protect your personal information by contractual means.

### **Retention**

We will not retain your personal information for longer than is necessary for processing your application, or for legal or regulatory requirements.

### **Handling Privacy Concerns**

If you have any questions about this notice or if you believe that your personal information is not handled in accordance with the applicable law or this notice, you have several options:

- Contact the Recruitment /Human Resources team (at [peopleteam@eastofengland.coop](mailto:peopleteam@eastofengland.coop) or by calling 01473 786011);

- Contact the Society's data protection officer: The Secretary, Jonathan Carey, at Wherstead Park or email [jcarey@eastofengland.coop](mailto:jcarey@eastofengland.coop) or phone 01473 786032

You have a right to lodge a complaint with the Information Commissioner's Office if you believe we have not complied with our legal data processing obligations. Please refer to <https://ico.org.uk> for further details.

This privacy note was last updated 8<sup>th</sup> February 2022