

# APPLICANT PRIVACY NOTICE

This Applicant Privacy Notice covers how Secure Schools Limited (referred to as “we” “us” “our” and “**Secure Schools**” in this notice) handles the personal data of Applicants (“you”, “your”) when you apply for employment with Secure Schools within our capacity as a data controller.

We have prepared this Applicant Privacy Notice (“**Privacy Notice**”) to ensure that we communicate to you, in the clearest way possible, how we treat your personal information. We encourage you to read this Privacy Notice carefully as it details our obligations under Data Protection Legislation and supports your individual rights.

We are committed to ensuring that your personal information remains confidential and secure in accordance with applicable Data Protection Legislation.

This notice sets out how we look after your personal data if you are an Applicant to a job vacancy, or have submitted your information with the purpose of seeking employment with Secure Schools.

This Privacy Notice describes the types of information that we collect from you during the recruitment process, how that information may be used or disclosed by us and the safeguards we use to protect it.

‘**Personal data**’ means information that can be used to identify you. It can consist of a single piece of information, such as your name, or it can comprise of separate pieces of information, which, when combined, would help others to identify you.

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

We may update this notice from time to time, and this will be updated on our website and provided internally as required.

## 1. Questions

If you have any queries about this Privacy Notice, you may contact the Security & Privacy team using the following details:

Address: Furlong House, 2 Kings Court, Newmarket, Suffolk, England, CB8 7SG

Email address: [privacy@secareschools.com](mailto:privacy@secareschools.com)

Our ICO registration number is ZA577543

## 2. What Personal Data will we collect?

This personal data we collect may include, but is not limited to:

### Identity Data:

- your name,
- contact information, including email, postal address or your telephone number,

### Recruitment information including;

- Completed online application forms or CVs,
- Equal opportunities monitoring forms,
- Notes from interviews and short-listing exercises,
- Confidential references,
- Any applicable qualifications or portfolios

A full overview of all Personal Data we collect, our reason for doing so and the lawful basis of processing is documented in Annex A.

## 3. How will we collect Personal Data?

This personal data may be collected from a number of sources, including, but not limited to:

- Provided directly by yourself; either directly to us, through a third party recruitment platform or provided during interview
- Collected via publicly available sources, such as Social Media platforms

## 4. What will Personal Data be used for?

We will collect personal data for a number of reasons, including, but not limited to:

- Job recruitment; which can include data collection through third-party online portals, background checks, and references
- Onboarding you through initial employment stages
- To support in maintaining security of our premises and digital environment

A full overview of all Personal Data we collect, our reason for doing so and the lawful basis of processing is documented in Annex A.

## **5. Sharing your personal data**

We may need to share your personal data in the course of our recruitment process. We may share your personal data with the following third parties:

- Our professional advisers, including lawyers, auditors and insurers,
- Service providers who provide IT and system administration services, or who store data on our behalf,
- Third party organisations as required to comply with our legal obligations, including, but not limited to; HM Revenue and Customs, our pension service providers,
- Third party software providers, including any recruitment tool we use from time to time,

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the Data Protection Legislation.

## **6. Retention period**

We will only retain your personal data 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.

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.

For more details of our specific retention periods, please contact our Data Protection Officer.

## **7. Data Security**

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected and processed through our Site.

We have implemented significant security measures to maintain a high level of security.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.

If we give you a password upon registration on our Site, you must keep it confidential. Please don't share it.

## **8. Use of Generative Artificial Intelligence**

We may from time to time engage the services of a third-party service provider of Generative Artificial Intelligence (A.I.) software including but not limited to during our recruitment process, subject to you providing us with clear advance consent.

We may use such A.I software during interviews to:

- Record you during the interview (audio recording)
- Produce a full written transcript of interviews held with candidates
- Provide a written summary of the interview for further review internally by our recruitment team or hiring managers

All use of A.I will be in accordance with our Generative Artificial Intelligence in the Workplace Policy.

Any use of A.I. supplements our existing robust recruitment process by producing interview transcripts that can be reviewed by a hiring manager or member of our recruitment team.

Our use of A.I. will not:

- Make automated decisions on a candidates success during a job interview
- Be used without human input to determine a candidate's performance or suitability for a job role
- Be used where you have not provided clear consent

## 9. Your rights as a data subject

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are set out below. If you wish to exercise any of the rights set out below, please contact our Data Protection Officer.

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

Your rights are as follows:

- **Right of access** – you have the right to request a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Right of rectification** – you have a right to request that we correct personal data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten / erasure** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply, you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

Where we are relying on your consent to process your personal data, you may withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent, or to processing carried out on other legal grounds. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

All of the above requests will be forwarded to the relevant third party, should there be a third party involved in the processing of your personal data.

## **10. Complaints to the Information Commissioner's Office**

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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance by emailing us at [privacy@secureschools.com](mailto:privacy@secureschools.com).

## Annex A

### Personal Data held by Secure Schools, purpose of collection and lawful basis of processing.

**Table 1:** Personal and Special Category Data collected during the recruitment process

Type of Data	Collected via:	Used for	Lawful basis
your name, contact information, including email and postal address and your telephone number,	direct submission via online application forms or CVs	Contacting you to discuss potential employment, arrange interviews and discuss offers of employment	Your legitimate interest , your consent
Information held in completed online application forms or CVs,	direct submission on our third party portal	To review your potential as a candidate	Your legitimate interest, your consent
Details of any applicable qualifications, or portfolios	supplied by you directly during interviews or through CVs and/or online application forms	To review your potential as a candidate	Your legitimate interest, your consent
Notes from interviews and short-listing exercises,	taken via our recruitment team directly	To review your potential as a candidate	Your legitimate interest, your consent
Transcripts from interviews	taken via a third-party A.I tool when speaking virtually with our recruitment team	To document discussions held during an interview	Your consent
Confidential references,	Received from a third party	To support in employment decision making	For the performance of a contract
Criminal records checks,	Disclosure and Barring Service checks	To support in employment decision making	For the performance of a contract