

# JOB APPLICANT PRIVACY NOTICE

**Data Controller:** Ocean Network Express (Europe) Ltd, 6th Floor, 20 Churchill Place, Canary Wharf, London, E14 5GY, United Kingdom

**Data Privacy Manager:** David Young

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

## What information does ONE collect?

ONE 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
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

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

ONE 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. Please note that ONE 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 information systems and on other IT systems (including email).

## Why does ONE process personal data?

ONE 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, ONE 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.

ONE 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 ONE to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. ONE may also need to process data from job applicants to respond to and defend against legal claims.

Where ONE 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.

ONE 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 ONE 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 ONE 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.

ONE will not use your data for any purpose other than the recruitment exercise for which you have applied.

### **Who has access to data?**

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

ONE will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. ONE will then share your data with either former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks if required.

Your data may be transferred outside the European Economic Area (EEA) as part of the recruitment process. Data is transferred outside the EEA on the basis of binding corporate rules within the ONE Group

### **How does ONE protect data?**

ONE takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Details of these policies can be provided on request.

### **For how long does ONE keep data?**

If your application for employment is unsuccessful, ONE will hold your data on file for 7 months after the end of the relevant recruitment process. If you agree to allow the organisation to keep your personal data on file, the organisation will hold your data on file for a further 5 months for consideration for future employment opportunities. At the end of that period or if 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 an employee privacy notice.

## **Your rights**

As a data subject, you can:

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

If you would like to exercise any of these rights, please contact the HR Team. You may make a subject access request by contacting the HR team and completing the relevant form

If you believe that ONE has not complied with your data protection rights, you can make a complaint to the Information Commissioner.

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to ONE during the recruitment process. However, if you do not provide the information, ONE 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**

Current recruitment processes are not based on automated decision-making.