



Privacy Notice for Recruitment

Introduction

This Privacy Notice explains how we use personal information we collect about you and how you can exercise your data subject rights, which are available to everyone. We will collect, process and store your personal information, for the purposes listed in this Privacy Notice.

Please read this Privacy Notice carefully, to inform you, how your personal information is processed. We are committed to protecting and respecting how we treat your personal information, as if it was our own.

Details of who we are

We are Bapchild Motoring World (Kent) Limited. We act as the data controller under the UK General Data Protection Regulation, Data Protection Act 2018 and other applicable national implementing legislation.

Big Motoring World and BigWantsYourCar.com are referred to as “we”, “us” and “our”.

Our contact details

Name: Bapchild Motoring World (Kent) Limited, who trade as Big Motoring World and BigWantsYourCar.com, company number 04742605.

Address: Bailey Drive, Gillingham Business Park, Gillingham, Kent, ME8 0PZ.

Phone Number: 01634 248 638

Data Protection Officer Email: privacy@bigmotoringworld.co.uk

The purposes of processing your personal information

We process your personal data for the following purposes:

- For recruitment – to process applications from potential employees and consultants (this includes providing personal data directly or indirectly, through a recruitment agency)
- To assess your suitability for a role you have applied for
- To securely destroy unsolicited applications
- To shortlist
- To interview
- To make conditional offers
- To verify application details when an offer has been accepted

- CCTV in operation ensures the health and safety of our visitors, to reduce, detect, prevent the incidence of crime, to respond to all types of harassment and disorder, create a safe environment, reduce the fear of crime, for the defence of legal/insurance claims, assist with health & safety and provide emergency services with assistance.

When you apply for a role that has been advertised, we will use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your application. We'll use the other information you provide to assess your suitability for the role.

The type of personal information we collect

We will not collect more information than is necessary to fulfil its stated purpose and will not keep it any longer than is necessary. With respect to advertised roles, the information asked for is used to assess your suitability for employment. You do not have to provide what we ask for, but it may affect your application if you don't.

Unsolicited Applications

We do not normally consider unsolicited applications. Where unsolicited CVs are received from agencies, these will normally be securely destroyed upon receipt.

Where unsolicited CVs are received directly from an individual, we will consider if there is current suitable role, or if the CV looks suitable for the future, and if so will seek agreement and permission from the individual to keep the CV on file for any future vacancies. In the absence of such permission being forthcoming in a timely manner, the CV will be securely destroyed within 12 months.

Applications

We will receive your personal data and special categories of personal data from you directly or, occasionally, from a third party (e.g. a recruitment agency) for the recruitment purposes set out above. The categories of personal data may include:

- Name and contact details
- Previous experience
- Education
- Referees
- Answers to questions relevant to the role
- Medical history
- Salary information
- CCTV footage

Our recruitment and HR team will have access to all this information.

Conditional Offer

If we make a conditional offer of employment, we'll ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks before

commencing employment with us. We must confirm the identity of our employees and their right to work in the United Kingdom, and seek assurance as to their trustworthiness, integrity and reliability.

You must therefore provide upon request:

- proof of your identity
- a questionnaire may be sent to you with our conditional offer, to confirm your fitness to undertake the role you have been offered
- proof of your qualifications (if requested)
- a criminal records declaration to declare any unspent convictions (if requested)
- your email address
- your address

How we get your personal information and why we have it

Most of the personal information we process is provided directly by you or indirectly, from recruitment agencies or employee referrals. We use your personal information for the purposes listed in this Privacy Notice.

What is the lawful basis to process your personal information

We collect and use this information under provisions contained in the UK General Data Protection Regulation. Specifically, we collect the information referred to above under the requirements of a contractual obligation or to take steps at your request, before entering a contract. (Article 6 (1) (b)) and necessary for our legitimate interests of visitor safety, fraud and prevention of crime (Article 6 (1) (c)).

In relation to those elements of personal data described above as 'special category' items of personal information, we also collect that information under Article 9 of the UK General Data Protection Regulation. The legal basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnic information is Article 9(2)(b) of the UK GDPR, which also relates to our obligations in employment and the safeguarding of your fundamental rights and Article 9(2)(h) for assessing your work capacity as an employee. And Schedule 1 part 1(1) and (2)(a) and (b) of the Data Protection Act 2018 which relates to processing for employment, the assessment of your working capacity and preventative or occupational medicine.

CCTV is in operation at all sites, including offices. We use substantial public interest, for the purposes of detecting and preventing crime, as our condition to process CCTV personal data (Article 9 (g) and Schedule 1 part 2 (10)).

Who do we share your personal information with

Only those members of the workforce who have a valid business 'need to know' will be granted access to your personal data. Further, individual team members will only be given access to the part of your data that they need to perform their roles.

Our recruitment team will have access to your application. Your data will be used by the recruitment team to:

- provide human resources services to you related to recruitment
- decide whether to shortlist or reject your application

- prepare for and carry out the interview process
- to make a decision whether to employ you including contacting you to inform you about our decision
- where relevant, to make a conditional offer
- where relevant, to verify the details of your application
- where relevant, to provide a transition for you to become an employee.

When you become an employee, the Employment Privacy Notice will apply.

Externally, your data may be shared with the external organisations / individuals for the following purposes, as set out below:

- to allow criminal records check and credit check (if applicable) or sanctions search to be performed.

Wherever possible those data shared are either anonymised and/or minimised and only those with a valid business 'need to know' in the receiving organisation are granted access.

Details of transfers of personal information to any third countries and safeguards

We currently do not transfer your personal information outside the United Kingdom / Europe, to a third country, that does not benefit from an adequacy decision.

Retention period or criteria used to determine the retention period

Your personal data will be kept for as long as is necessary for us to meet its legal obligations with respect to all aspects of employment.

- **Unsolicited applications** will usually be destroyed immediately as a matter of best practice, unless, by agreement with the applicant their details can be kept on file for consideration for future roles.
- **Successful recruitment candidate information** (including third party referee details provided by the applicant). If there is no activity on your candidate account for 12 months, it will be deactivated. You can also request to withdraw your details at any time and thereafter your data will be fully anonymised for further protection.
- **Unsuccessful recruitment candidate information** (including third party referee details provided by the applicant) If there is no activity on your candidate account for 12 months, it will be deactivated. You can also request to withdraw your details at any time and thereafter your data will be fully anonymised for further protection.

How we store your personal information

Your information is securely stored.

We keep all your personal information, detailed in this Privacy Notice, for employment purposes, for a period specified in our retention policy.

We will then dispose your information by deletion.

Your data protection rights

You have the right to exercise the following rights under UK data protection law. These rights are not absolute and will depend on which legal basis we use to process your personal data.

Please contact us using the contact details set out above if you wish to exercise any of these rights:

- **Transparency** – we must provide you with all the information set out in this privacy notice in a concise, transparent, intelligible and easily accessible form, using clear and plain language, so that you may understand how and why we process your data and what your rights are. We must keep you informed in timely manner about our progress in responding to requests from you to access your rights under data protection law.
- **Rights of access by the data subject** – you have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, to access your personal data.
- **Right to rectification** – you have the right to have the personal data concerning yourself rectified without undue delay, if it not accurate. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by providing a supplementary statement.
- **Right to erasure ('right to be forgotten')** – in some limited circumstances, you may have the right to obtain from us the erasure of your personal data without undue delay, when and if:
 - Processing your personal data is no longer necessary in relation to the purposes for which your data were collected
 - Where you withdraw consent for processing, but only if consent was the legal basis relied upon for that processing
 - You object to processing and there are no overriding legitimate grounds for the processing or where you withdraw your consent to marketing. NB This does not apply to employees or former employees or applicants where we have a legal obligation to retain your data
 - Your personal data has been unlawfully processed
 - Your personal data has to be erased to comply with a legal obligation to which the Controller is subject
 - Your personal data has been collected in relation to the offer of information society services to children
- **Right to restriction of processing** – In some limited circumstances you have the right to request that the processing of your personal data is restricted, in some cases for a limited time only, specifically when:
 - You are contesting the accuracy of your personal data while we verify its accuracy or correct it
 - The processing is unlawful and you oppose the erasure of your data;
 - Where we no longer need your personal data for the purposes for which it was obtained but where you require the data for the establishment, exercise or defence of legal claims

- Where you have objected to the processing of your data pending the verification whether legitimate grounds of the Controller override your interests.
 - You have the right to be informed by the Controller before the restriction of processing is lifted
- **Notification obligation regarding rectification or erasure of personal data or restriction of processing – we will let you know when the following things happen, unless it proves impossible or disproportionate to do so:**
 - When we have rectified your data
 - When we have erased your personal data
 - When we have restricted the processing of your personal data
 - When we intend to lift any restriction to the processing of your personal data
 - We will also advise you about any recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort
- **Right to data portability** – upon your request and where the legal basis for processing your personal data is ‘consent’ or ‘contract’, we will provide you with a copy of your personal data that you have provided to us and which are processed by automated means, in a structured, commonly used and machine-readable format. Upon your request and where technically feasible, we will also transmit those data to another data controller.
- **Right to object** – In some limited circumstances, you have the right to object to our processing of your personal data. When certain conditions are met, we, as Controller, will no longer process your personal data. This right can be exercised only when:
 - Either the processing is necessary for the performance of a task carried out in the public interest or processing is necessary for the purposes of our legitimate interests (including profiling), but where we cannot demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or where processing is necessary for the establishment, exercise or defence of legal claims
 - Processing for direct marketing purposes, including profiling
 - When personal data are processed for scientific or historical research purposes or statistical purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest
- **Automated decision-making, including profiling** – you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significant effects. At the current time we do not perform automated decision making or profiling.
- **Details of whether you are under a statutory or contractual obligation to provide the personal data** – we have a legal obligation to perform checks for employment purposes for some roles. Failing to do so would be a breach of the law.

- **The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences** – we do not currently perform automated decision making or profiling, relating to recruitment processing.

Changes to our Privacy Notice

Any changes to this Privacy Notice in the future will be posted on our website.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us, by using the contact details provided above, in this Privacy Notice.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

ICO Registration Reference: ZA114225