

Privacy Notice

Updated: March 2021

As part of our recruitment process, we collect and process personal data relating to job applicants. We are committed to being transparent about how we intend to collect and use your data, and how we meet our data protection obligations. If you have any queries about the process or how we handle your information, please contact us at InformationSecurityTeam@pnfp.co.uk.

What information do we collect?

Throughout the application, recruitment, and employment process, we start collecting your data, with a view to entering a contract of employment with you.

All the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We collect the following information about you:

- 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.

We collect this information in a variety of ways. For example, data may be contained in your application form, CV, passport, other identity documents or collected through your interview and assessment.

We will also collect personal data about you from third parties, such as references supplied by former employers, information from HireRight (our employment background check provider), and information from criminal and credit checks. We will only seek this information however, if you are offered a position with us. You will also be informed of these checks before they are undertaken.

Data will be stored in a range of different places, including in your personnel file, in our HR management system, IRIS, and on other IT systems (including email).

Why do we process personal data?

We need to process your data to take steps, at your request, prior to entering into an employment contract with you. We also need to process your data to enter into a contract with you to ensure compliance with our legal obligations. An example of this would be checking your eligibility to work in the UK before any employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process and to confirm your suitability for employment. We may also need to process data from job applicants to respond to and defend against legal claims.

Where we rely on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of you as a job applicant, existing partners or workers and we have concluded that they are not.

We process health information if we are required to make reasonable adjustments to the recruitment process. For example, if you have a disability, we will consider suitable adjustments to the process. This is to ensure that we are carrying out our obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, this is for equal opportunities monitoring purposes.

We are obligated to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment and for us to comply with the appropriate regulatory requirements.

We 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 process.

This includes members of the People Team, interviewers involved in the recruitment process, managers in the business area with a vacancy and the IT Team if access to the data is necessary for the performance of their roles.

We will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you. We may need to share your data to undertake employment background checks.

Your data may be transferred outside the European Economic Area (EEA) to facilitate your future employment with another employer, or to gain a reference from.

Protecting your data

We take the protection of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and that it is not accessed except by our partners in the proper performance of their duties.

Retaining your data

If your application is unsuccessful, we will hold your data on file for six months after the end of the relevant recruitment process. If you consent to allowing us to keep your personal data on file, it will do so for a further six months for consideration for future employment. At the end of that period (or once 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 our Privacy and Personal Data Policy.

Your rights

As a data subject, you have several rights. You can:

- Access and obtain a copy of your data on request.
- Require us to change incorrect or incomplete data.
- Require us 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 we rely on its legitimate interests as the legal ground for processing.

- Ask us to stop processing data for a period of time if data is inaccurate or there is a dispute about if your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact People@pnfp.co.uk.

You can also make a subject access request if you believe that we have not complied with your data protection rights and you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide us with your data during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all. If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

Automated decision-making

Recruitment processes are not based solely on automated decision-making.

Brexit

Transfers of personal data from the European Economic Area (EEA) to the UK become more complex from 1 January 2021. If we are required to transfer personal data from the EEA to the UK we will put in place alternative safeguards, such as standard contractual clauses (SCCs), which are terms and conditions to which the sender and receiver of the personal data both sign up. The Information Commissioner's Office (ICO) provides further [guidance on keeping data flowing from the EEA to the UK](#), which includes templates for SCCs.