

Recruitment Data Privacy Statement

1. What is the purpose of this document?

Monmouthshire Building Society is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (*(EU) 2016/679*) (GDPR).

2. Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter, e.g. name, title, address, telephone number, personal email address, date of birth, gender, information regarding your knowledge and skills, driving information, professional qualifications and memberships, employment history, education and training information.

- The information you have provided on our application form, e.g. name, title, address, telephone number, personal email address, work contact details, date of birth, gender, written responses to questions asked regarding you knowledge and skills, driving information, professional qualifications and memberships, nationality and VISA information, directorship information, employment history, education and training information.

- Information regarding the categorisation of the individual's application under the shortlisting process. Flag system showing which stage of the application process you are.

- Any information you provide to us during an interview and assessment centre e.g. interview records showing answers you gave to questions asked and assessment centre results.

- Psychometric testing results.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Equal Opportunities information, e.g. information about your race, nationality or ethnicity, religious beliefs, sexual orientation, marital status, age, gender and disabilities in the form of statistical data only.

- Information about criminal convictions and offences (For certification and Senior Managers Regime (SMR) functioning roles only).

- Information about credit history, e.g. address and name history, credit history information, date of birth and gender information.

- Previous employment referees and personnel referees, e.g. name, work contact details of previous employer, dates of employment and name, personnel contact details of personnel referees relationship of referee to you. **(Please make sure you check with your referees first before providing their contact details to us that they are happy for you to provide them as referee. We will not approach your referees unless you have been offered a role or work contract with the Society).**

4. How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.

- Recruitment agencies, from which we collect the following categories of data, e.g. cv, name, title, telephone number, personal email address, professional qualifications and memberships, employment history, education and training information.

- Background check provider / Disclosure and Barring Service (for certificated roles or roles which hold SMR functions), from which we collect the following categories of data e.g. criminal convictions and offence information, credit history information and employment / personnel reference information as provided by yourself.

- Your named regulatory referees, from whom we collect the following categories of data (for Certificated and SMR functioning roles only) e.g. name, work contact details of previous employer, dates of employment and relationship of referee to you.

- Your named referees, from whom we collect the following categories of data: (For all other Society roles) e.g. name, work contact details of previous employer, dates of employment and name, personnel contact details of personnel referees relationship of referee to you.

5. How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role or work contract.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.

- Comply with legal or regulatory requirements.

It is in our legitimate interests to use the information collected to decide whether to appoint you to the role.

We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV and application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you a role or work contract (for contractors not employed directly by the Society). If we decide to offer you a role or contractor work, we will then take up references, undertake credit checks and in cases of Certificated or SMR functioning roles carry out a criminal records checks following an offer of employment or contract (for contractors not employed directly by the Society) being made.

6. If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to process your offer of employment / work contract (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your offer of employment further and reserve the right to withdraw any offer of employment made.

7. How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an assessment centre or interview.

- We will use information about your race or nationality or ethnic origin, religious or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. This information is collected by our external recruitment platform and is only provided to us in statistical form.

8. Information about criminal convictions

We will collect information about your criminal convictions history if we would like to offer you contracting work or a role employed directly by the Society (conditional on checks and any other conditions, such as references, being satisfactory) if the role holds certification regulations or SMR functions. We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the Financial Conduct Authority (FCA) to carry out criminal record checks for those carrying out certificated roles or roles which hold an SMR function.

- Roles which require certification approval or FCA approval are ones which under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (*SI 1975/1023*)] and the Police Act 1997 (Criminal Records) Regulations (*SI 2002/233*) are eligible for an enhanced check from the Disclosure and Barring Service.
- These roles require a high degree of trust and integrity. Given the nature of our business, we consider that it is necessary in the public interest to undertake these checks and so we would like to ask you to seek an enhanced disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data which will be provided to you upon your offer of employment (titled 'Employee and Contractor Data Privacy Statement' and 'Special Category Data Policy').

9. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

10. Data sharing

10.1 Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: our external recruitment platform provider. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

10.2 Transferring information outside the EU

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area (EEA).This may be through a third party whom we may utilise for reasons stipulated in paragraph 10.1.

Where we contract with such providers then if your personal information is processed within Europe or other parts of the EEA then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us.

Safeguards include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standard required in the EEA. Safeguards may also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

10.3 Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Human Resources Department.

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

11. Data retention

11.1 How long will you use my information for?

We will retain your personal information for a period of 12 months months after we have communicated to you our decision about whether to appoint you to a role within the Society or to enter into a work contract with you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

12. Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

  If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Head of HR in writing.

13. Right to withdraw consent

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Head of HR in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

14. Data protection officer

It is the role of the Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at dataprotection@monbs.com. 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.