

# Recruitment: Privacy Statement for Candidates

## 1. Scope

Protecting the security and privacy of your personal data is important to Idox plc and all its group companies (the "Idox Group"). This privacy notice sets out how and why we collect data for the purposes of recruitment, how your data is used, and your rights. Idox Software Limited is the controller of your personal data and is responsible for this privacy notice.

## 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; and
- Kept securely.

## 3. Data protection legislation

Idox's processing of personal data and privacy is in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) as it forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 (including as further amended or modified by the laws of the United Kingdom or a part of the United Kingdom from time to time) ("GDPR").

In this policy, "Data Protection Legislation" refers to the GDPR, and the Data Protection Act 2018 to the extent that it relates to the processing of personal data and privacy and all applicable Law about the processing of personal data and privacy.

## 4. Our legal basis for processing your personal data

We will only use your personal data when the Data Protection Legislation allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- **Contract:** where processing personal information is necessary to move applications forward before signing a contract of employment;
- **Legal obligation:** where processing personal information is required by law. For example, when we are required by law to perform checks about your right to work in the location of the vacancy or to ensure reasonable adjustments are made for disabled applicants;
- **Legitimate interest:** where it is in the legitimate interests of Idox (or a relevant third party), to process personal information. For example: in order to decide whether to offer employment, to make decisions about salary and benefits, to assess training needs, to defend legal claims against us and to send you notifications about your progress and other vacancies which are relevant to you; and

- **Consent:** in certain circumstances, such as when we process special category information about you, we may be required to seek your consent. Where we do ask for your consent, we will tell you the reasons for the processing, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time.

## **5. 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;
- The information you have provided on any application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications;
- Any information you provide to us during an interview; and
- Information provided by you in the public domain, for example LinkedIn profile.

We may also collect, store and use the following types of more sensitive personal information if provided voluntarily by you:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences.

## **6. How is your personal information collected?**

Usually, we collect personal information directly from you when you apply for a position with us, whether this is online, through emails or otherwise. However, there are occasions where we may learn about you through third parties, including:

- Recruitment agencies;
- Where an employee recommends you;
- LinkedIn;
- Your named referees;
- Disclosure and Barring Service in respect of criminal convictions.

## **7. 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;
- Understand your minimum requirements of Idox and your desired attributes of a possible job, for example your salary and the region you would like to work.
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our hiring processes; and
- Comply with legal or regulatory requirements.

If you do not provide information when requested, which is necessary for us to consider your application (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 application further.

## **8. 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 to ensure full access to interview facilities;
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and
- To be able to answer mandatory, ad hoc reports from UK Government and other sources, for example ONS data requests. These reports are normally anonymised.

## **9. Information about criminal convictions**

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). 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.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## **10. Automated decision-making**

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

## **11. 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: the wider Idox team, hiring managers and other members of staff who may have access to personal information where such access is required to assist with the recruitment

process. Where you have applied through a recruitment agency, we may share personal information with them. Where you are successful, we may share personal information with third parties to obtain references and to perform pre-employment checks.

Depending on the role applied for, we may conduct criminal record or credit checks. We will only carry out such pre-employment checks where we have a legal requirement to do so, where such checks are generally accepted principles of good practice and where such checks are directly relevant to the particular position applied for.

All our third-party service providers and other entities in the group 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.

## **12. Data security**

We use appropriate technical, organisational and administrative measures to protect any personal information we process about you. All personal information collected from you is stored on servers in the United Kingdom and other countries within the European Economic Area ("EEA").

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.

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.

## **13. How long will you use my information for?**

We will retain your personal information for a minimum of period of 6 months and a maximum 24 months, from your last contact with Idox, or after we have communicated to you our decision about whether to appoint you to. 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 applicable laws and regulations; and
- in the event that a further opportunity arises in future and we may wish to consider you for that, as part of our Talent Acquisition programme and knowledge base
- Inactive applications will be deleted automatically at 24 months.

## **14. Your rights in connection with personal information**

Under certain circumstances, by the Data Protection Legislation provides you 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.

### **15. Data protection officer**

We have appointed a data protection officer (DPO) 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 DPO at [privacy@idoxgroup.com](mailto:privacy@idoxgroup.com) or by writing to us at: Idox Software, Second Floor, 1310 Waterside, Arlington Business Park, Theale RG7 4SA, UK

### **16. Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK. The current contact details for the ICO are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

### **17. Changes to this statement**

We may change this Privacy Statement from time to time. If we make any changes, we will post these on this page and change the "Last Updated" date below. We encourage you to check this Privacy Statement frequently to stay informed of the latest modifications.

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