

## Recruitment Privacy Notice – Thanet Earth

This privacy notice helps you understand how we use your personal data, who we share it with and what rights you have relating to your personal data when you apply for a role at Thanet Earth Limited (**Thanet Earth**)

Throughout the privacy notice when we mention “**we**” “**our**” or “**us**” we are referring to the controller of your personal data. Thanet Earth is the controller of your personal data.

This privacy notice applies to anyone who applies to work at Thanet Earth on a permanent and a non-permanent basis, including contingent workers, temporary and contract workers, independent contractors, consultants, professional advisors, secondees, interns and other third parties engaged to carry out work for us and who have access to our premises or internal systems (collectively referred to in this privacy notice as “**you**” and/or “**applicant**”). This categorisation is for convenience and does not indicate any particular status.

This privacy notice helps you understand how we use your personal data, who we share it with and what rights you have relating to your personal data.

If you have any questions about this privacy notice or how we handle your personal data please contact the HR team at [HR@thanetearth.com](mailto:HR@thanetearth.com).

### **1. What personal data do we collect about you?**

1.1 Throughout your application process, we will collect and process personal data about you. This includes the following information:

- 1.1.1 basic contact details including full legal name, telephone number, personal email address, and postal address;
- 1.1.2 CV and full work history;
- 1.1.3 references details from previous employer(s);
- 1.1.4 details of your nationality and immigration status;
- 1.1.5 details of your required working patterns; and
- 1.1.6 details of your preferred place of work.

**2. What is our lawful basis for using your personal data?**

2.1 When we use your personal data, we must have a lawful reason. This is referred to as a “lawful basis”. The table below sets out the personal data we collect and use about you and the lawful basis we will rely on.

2.2 You are required (by law or in order to enter into your contract of employment) to provide the categories of personal data marked “\*”. If you do not provide this personal data, we may not be able to continue with your application process or make an offer of employment to you.

Personal data processed	Purpose of processing	Lawful basis
Basic contact details including full legal name; telephone number; personal email address; and postal address*	To contact you, in order to discuss your application with Thanet Earth	Legitimate interests to assist with our recruitment process and appoint the most appropriate person.
	To enable us to send you updates of future relevant positions at Thanet Earth, if you were not successful in your original application	Consent
CV and full work history and references from previous employer(s)*	To assess your suitability to work for us	Legitimate interests to assist with our recruitment process and appoint the most appropriate person.
Your nationality and immigration status *	To demonstrate that you can legally work in the UK and Ireland if we offer you a role	Legal obligation
Details of your working requirements	To ensure that you are able to meet the requirements of the role, for example you can commit to the expected hours	Legitimate interests to assist with our recruitment process and appoint the most appropriate person.
Opinions and responses given to a series of competency based questions during your interview*	To assess your suitability to work for us and ensure you fit with the culture of Thanet Earth	Legitimate interests to assist with our recruitment process and appoint the most appropriate person.

Details of professional development training or relevant qualifications *	To assess if you have suitable qualifications or training for the role that you are applying for	Legitimate interests to assist with our recruitment process and appoint the most appropriate person.
CCTV images If you come visit us for an interview or assessment	To maintain a safe environment and to investigate any incidents that occur	Legitimate interests: To maintain a safe environment and to investigate any incidents that occur

**3. Special category data**

- 3.1 During your application we may collect any sensitive personal data about you, this is known as “special category data”. For your reference Special category data includes, details of medical history or special requirements you may need in order to perform your role.
- 3.2 This is in order to ensure we will consider any reasonable adjustment you require.
- 3.3 We do not process any criminal data about you.
- 3.4 If you are offered a position at Thanet Earth we may collect additional special category data and this will be fully detailed within our Employee Privacy Notice, which we will provide to you.
- 3.5 If you require any further information regarding the processing of special category data, please contact our HR Department.

**4. Sharing your personal data with third parties**

- 4.1 During your application process, it may be necessary for us to share your personal data with third parties, to assist with your application process and the operational running of our business. The types of third parties with whom we will share your personal data, includes:
  - 4.1.1 our online recruitment platform provider;
  - 4.1.2 IT services providers;
  - 4.1.3 regulatory or law enforcement agencies;
  - 4.1.4 professional advisors, such as lawyers and accountants;
  - 4.1.5 prospective/previous employers (reference purposes); or
  - 4.1.6 potential purchasers of some or all of our business or on a re-structuring.
- 4.2 When we share your personal data with third parties, we only permit them to process your personal data for specified purposes in accordance with our instructions. We require all third parties to respect the security of your personal data and to treat it in accordance with data

protection laws and the recipient of the personal data will be bound by confidentiality obligations.

## **5. Keeping your personal data secure**

- 5.1 We have appropriate security measures in place to prevent personal data from being accidentally lost, used or accessed in an unauthorised way.
- 5.2 We limit access to your personal data to those who have a genuine business need. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.
- 5.3 We also have procedures in place to deal with a suspected personal data security breach. We will notify you and any relevant regulator of a suspected personal data security breach where we are legally required to do so.

## **6. How long do we keep your personal data for?**

- 6.1 If you are not successful in the role we will retain your application records for a further 12 months, this is to allow Thanet Earth to respond to any queries regarding to your application or to contact you about other relevant positions if you have provided consent.
- 6.2 If you are provided a role at Thanet Earth, your personal data will be processed as an employee of Thanet Earth and will be retained in accordance with our Employee Privacy Notice.

## **7. Transferring data overseas**

- 7.1 In some cases, we may need to transfer personal data outside the United Kingdom (**UK**). Where this is the case, we will only share the minimal amount of personal data necessary for the purpose of processing and, where possible, we will share the personal data in an anonymised form.
- 7.2 Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
  - 7.2.1 we may transfer your personal data to countries for whom there has been an adequacy decision by the UK Secretary of State (as applicable) confirming that the country provides an adequate level of protection for personal data; or
  - 7.2.2 we may use specific contracts approved by the UK Secretary of State which give personal data the same protection it has within the UK. When we rely on this measure, we will ensure that the third party can comply with the provisions of such contracts and we have confirmed that the country to which the personal data is transferred provides enforceable data subject rights and effective legal remedies for data subjects are available there; or

7.2.3 a specific exception applies under applicable data protection law.

7.3 Please contact HR@thanetearth.com if you would like further information about the specific mechanism used by us when transferring your personal data overseas.

## 8. Your Data Subject Rights

8.1 Under data protection laws you have the following rights:

8.1.1 **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

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

8.1.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see point d below).

8.1.4 **Object to processing** of your personal data 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.

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

8.1.6 **Request that your personal data is sent to another controller** (the right of portability). In certain circumstances, you have the right to get your personal data from us in a way that is accessible and machine-readable, and you also have the right to ask us to transfer your personal data to another organisation. This does not apply to all of your personal data, only personal data that you have provided to us and which is held electronically. We only have to comply with this right if it is technically feasible to provide this personal data in a commonly used format, for example, a CVS file.

8.2 If you wish to exercise any of your data subject rights, please contact the HR Department

8.3 In most cases we will deal with your request as soon as possible and at the latest within one calendar month of the date the request was received. If we need to extend the time period for responding to your request, we will let you know within the one-month period. We do not charge a fee for any such requests unless there are exceptional circumstances.

## 9. How to complain

9.1 We hope that we can resolve any query or concern you raise about our use of your personal data. If not, you can contact the UK Information Commissioner's Office at [ico.org.uk](http://ico.org.uk) or via telephone on 0303 123 1113 for further information about your rights and how to make a formal complaint.