CORNTHWAITE GROUP: Job Applicants Privacy Policy

1. INTRODUCTION

1.1 Cornthwaite Group is the trading name of the Cornthwaite Group of companies, which includes Cornthwaite Agricultural Limited and all other companies within the Cornthwaite group of companies whose registered address is Hall Lane, Bispham Green, Ormskirk, Lancashire, L40 3SB. Unless expressly specified, all Company policies are applicable to the group of companies, and reference to 'The Company', 'The Group' and 'The Employer' are used interchangeably to mean the Cornthwaite group of companies.

1.2 Our purpose in processing your information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

1.3 The lawful basis we rely on for processing your personal data are either:

(a) article 6 (1) (b) of the UK General Data Protection Regulation (GDPR) which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract; and/ or

(b) article 6 (1) (f) of the UK GDPR for the purpose of our legitimate interest; and/ or

(c) article 6 (1) (c) of the UK GDPR which relates to processing necessary or compliance with a legal obligation to which the controller is subject.

1.4 Cornthwaite Group is also a "controller" in relation to personal data, which means we are responsible for deciding how personal information about job applications is held and used. This privacy notice is to make any potential applicant aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise. Cornthwaite Group will comply with data protection laws and principles, which means that your data will be:

(a) used lawfully, fairly and in a transparent way;

(b) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;

(c) relevant to the purposes we have told you about and limited only to those purposes;

(d) accurate and kept up to date;

(e) kept only as long as necessary for the purposes we have told you about; and

(f) kept securely.

2. WHAT WILL WE DO WITH THE INFORMATION YOU GIVE US?

2.1 We will use the information you provide during the recruitment process to progress your application with a view to potentially offering you an employment or engagement contract with us.

2.2 We will use the information you provide to assess your suitability for the role, in particular, we will use the personal information we collect about you to:

(a) assess your skills, qualifications, and suitability for the role;

(b) communicate with you about the recruitment process;

(c) keep records related to our hiring processes; and

(d) comply with legal or regulatory requirements.

2.3 We do not share any of the information you provide with any third parties except: where we are required to by law or regulation (for example with law enforcement): and with service providers that help us operate our recruitment systems, under strict confidentiality and data protection obligations.

2.4 We do not sell, rent or trade your personal data.

3. WHAT INFORMATION DO WE ASK FOR AND WHY?

3.1 We do not collect more information than we need to fulfill our stated purposes. The information we ask for is to enable us to assess your suitability for employment, you don't have to provide what we ask for, but it may affect your application if you don't.

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

(a) the information you have provided to us in your curriculum vitae and covering letter, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and driving offences; and

(b) any information you provide to us during an interview or in email or telephone correspondence regarding your application.

3.3 We may also collect, store and use the following types of more sensitive personal information (also known as "special category personal data"):

(a) Information about your health, including any medical condition, health and sickness records. We may use this information to consider whether we need to provide appropriate adjustments during the recruitment process, for example, whether adjustments need to be made during an interview.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

4.1 We collect personal information about candidates from the candidate themselves, or through information the candidate has provided to third parties such as recruitment agencies.

5. HOW LONG WILL WE USE YOUR INFORMATION FOR?

5.1 For unsuccessful candidates, we will not keep your information for longer than 6 months after we have communicated to you our decision about whether to appoint you to the role. 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.

5.2 For successful candidates, your recruitment information will move into your staff file and personal data that we hold will be kept in accordance with our data retention policy.

6. HOW WE MAKE DECISIONS ABOUT RECRUITMENT

6.1 Final recruitment decisions are made by hiring managers and members of our recruitment team. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making. We take account of all the information gathered during the application process. You can ask about decisions on your application by emailing careers@cornthwaitegroup.com.

6.2 If you fail to 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.

6.3 We have a dedicated Data Protection team that can be contacted at data.privacy@cornthwaitegroup.com or 01539 756367. We make every effort to comply with UK General Data Protection Regulation and understand the importance of maintaining your confidentiality.

6.4 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. We ask that you contact us first before speaking with the ICO so that we have an opportunity to address any concerns that you may have.

7. FORMAL OFFER OF EMPLOYMENT

7.1 If we make a formal offer of employment, we must confirm the identity of our staff and their right to work in the United Kingdom. You must provide:

(a) **proof of identity/address & right to work** – you will be asked to attend our office with original documents (e.g. passport or birth certificate and National Insurance number), and we'll take copies;

(b) **bank/building society details** – to process salary payment; and

(c) **driving licence** (if applicable) – for insurance purposes and allow us to check your disqualification and endorsements.

8. DATA SHARING AND SECURITY

8.1 We may share your personal information with our third-party service providers and within our Group for the purposes of processing your application. 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.

8.2 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.

8.3 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.

9. WHAT ARE YOUR RIGHTS RELATING TO YOUR PERSONAL INFORMATION?

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

(a) 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;

(b) request correction of the personal information that the Group holds about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;

(c) request the 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);

(d) 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;

(e) 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; and

(f) request the transfer of your personal information to a third party.

9.2 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 our dedicated Data Protection team at data.privacy@cornthwaitegroup.com.