

Candidate - Privacy Notice

1. About this Notice:

This privacy notice regulates the use by Lincolnshire Co-operative Limited (the data controller) of the personal data we process about you when applying for one of our vacancies.

As we take the privacy and security of candidates' personal data seriously, we have developed this policy to tell you:

- The type of personal data we will collect
- How we will use your personal data
- When and why we will share your personal data with other third-party organisations
- Where we receive your personal data from
- How long we retain your personal data
- The rights and choices you have when it comes to your personal data.

2. Data Protection Principles:

We will comply with data protection law. This says that the personal information we hold about you must 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. Personal data we collect and use:

As part of our recruitment process, we will collect a range of information about you, either provided by you throughout the course of your application, or through recruitment agents acting on your behalf. We may also collect additional information from third parties including former employers, the General Pharmaceutical Council, credit reference agencies or other background check agencies. This will include:

- Your name and contact details, including your residential address, telephone numbers, e-mail address, date of birth, marital status and title along with any other personal data provided to verify your identity
- Details of your qualifications, skills, experience, education and employment history, including start and end dates with previous employers, (including

details of any periods where you were not working), references, professional memberships and other interests

- Information about your current level of remuneration, including any benefit entitlements
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process
- Information about your right to work in the UK
- Any responses from online testing you may complete during the application process
- Any photographs that may have been provided during the application process
- Where the role involves driving, details of your driving licence
- Where an interview takes place in person at one of our sites, CCTV imagery may be collected
- Where you have applied for a clinical role with us (such as a pharmacist) we will collect copies of your qualifications (such as your MPharm degree or OSPAP qualification), professional registration and any other documentation which is required for your role with us. We will also retain information about any pre-registration training which you have undertaken as well as your GPhC registration assessment and retain them in line with our retention policy
- Any other personal data you volunteer as part of the application process.

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

- Diversity and inclusion monitoring information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records, including:
 - Details of any absences (other than holidays) from work including time on statutory parental leave and sick leave
 - Where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes
- Information about criminal convictions and offences.

4. How your personal data is collected:

We collect personal information in a variety of different ways. For example, your personal data may be contained in any application forms provided, or in your CV or resume, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment including online and psychometric tests.

Any candidate information provided as part of the registration or recruitment process are managed through our third-party Applicant Tracking System, currently

provided by ITS Management Systems Ltd (Eploy). Eploy do not have access to candidate data as per their Privacy Statement, which you can access [here](#).

You are under no statutory or contractual obligation to provide any requested personal data to us during the recruitment process. However, if you do not provide the requested information, we may not be able to process your application properly or at all.

Certain information which will include the following, will have to be provided once an offer of employment is made to enable us to enter into a contract of employment with you:

- Legal gender
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information.

If you refuse or are unable to provide this information to us, we will be unable to confirm your offer of employment.

5. How we use your personal data:

We process your personal data, prior to entering into a contract with you, and if your application is successful to enter into a contract of employment, and to manage your employment with us.

In some cases, we need to process your personal data to ensure that we are complying with legal obligations imposed on us. For example, we are required to check a successful applicant's eligibility to work in the UK before their employment with us 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 our recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to allow us to investigate complaints and/or to respond to and where appropriate, defend legal claims.

We process health information, where volunteered by you, if we need to make reasonable adjustments to the recruitment process for candidates who have a disability or life-long health condition. This is to carry out our legal obligations in ensuring that we do not directly or indirectly discriminate against any individuals on the basis of their health. If you do not provide us with such health information, we will be unable to make any reasonable adjustments to accommodate you.

Where we process sensitive data such as information about ethnic origin, sexual orientation, physical or mental health or religion or belief as part of the application process, this is done regarding our obligations in employment and the safeguarding of your fundamental rights, to protect people from unintentional or indirect discrimination. You are not required to provide us with information for this purpose

during the application process and there will be no consequences for any applicant who elects not to provide it.

When you register on our recruitment system, we will keep your personal data on file in case there are future employment opportunities for which you may be suited for a period of 6 months. You will receive an email from us 5 months after the original date that you have set up job email alerts to ask for your permission to still receive them. You can update your preferences to stop receiving job alerts at any time by signing into your profile on our recruitment website at <https://careers.lincolnshire.coop>.

6. Who we share your personal data with:

Your personal data will be shared internally for the purposes of managing the recruitment process. This includes sharing your information with members of our HR and recruitment teams, interviewers involved in the recruitment process and managers in the business area with a vacancy. In addition, your personal data may be accessed, where necessary, by our IT colleagues for example, where they are maintaining our HR software.

We may have to share your data with third parties, including third-party service providers such as our HR systems service providers, recruitment agencies or right to work checks, professional advisors, your referees, online assessment providers, Government or public authorities, employment background check providers, the Disclosure and Barring Service (DBS) and other entities in our group. We require third parties to respect the security of your data and to treat it in accordance with the law. We will share your personal information with third parties where required by law, where it is necessary to administer the recruitment process with you or where we have another legitimate interest in doing so. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your information in line with our Society policies.

7. Where we may receive your personal data from

We will also collect personal data about you from third parties, including:

- When your details were provided by a recruitment agency
- Where applicable, references supplied by former employers
- Information from employment background check providers and for specified roles
- Information about any criminal convictions or offences (where this is relevant to the requirements of the role you are applying for and where the information has been made public or it is necessary to protect the interests of you or someone else)
- Fraud prevention checks and credit references may also be made dependent on job role.

We will only request your personal data from third parties once a job offer has been made and will inform you that we are doing so.

During our recruitment process, we will also collect information about any unspent criminal convictions and offences if it is appropriate given the nature of the role and where we are legally able to do so. We will use information about criminal convictions and offences for the following purposes:

- Any role that requires you to undertake a DBS check of which we will receive the outcome.
- When you (or a third party) make us aware of a criminal conviction and we deem that we have a lawful basis to retain this information.

Where we seek this information, we do so because it is necessary for it to carry out our obligations and exercise specific rights in relation to employment. We are allowed to use your personal information in this way to carry out our obligations. We have in place an appropriate procedure and safeguards which we are required by law to maintain when processing such data.

8. How long we retain your personal data

We will normally hold your data on file for up to 6 months after the end of the relevant recruitment process. We use third-party HR systems (E-ploy and iTrent) to retain and process candidates' information. If you agree to allow us to keep your personal data on file, with the purpose of enabling ease of future applications, you will receive an email after 5 months asking for your permission to retain for this purpose for a further 6 months. If you do not allow us to continue processing your personal data, then this will be deleted.

If you are unsuccessful in securing a role with us, then after 6 months we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you for reporting purposes.

If your application for employment is successful, any personal data gathered during the recruitment process will be transferred to your personnel file contained within a range of third-party HR systems (iTrent by MHR and Teamspirit) and retained during your employment. The periods for which your data will be held will be provided to you in our Employee, Worker and Contractor Privacy Notice which will be issued alongside your contract of employment.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for our recruitment process, you have the right to withdraw your consent for that specific process at any time. To withdraw your consent, please contact our Data Protection Officer by email at dataprotection@lincolnshire.coop.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose of our recruitment process, unless we have another legitimate basis for doing so in law.

9. Your rights and choices when it comes to your personal data

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 the personal information we hold about you, 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 Data Protection Officer by email at dataprotection@lincolnshire.coop.

10. Automated decision-making:

Some of our recruitment processes are based solely on automated decision-making. Certain vacancies that attract a large number of applicants may include a set of questions that requires specific responses to allow the applicant to move to the next stage of recruitment.

You have the following rights in respect of any automated decision-making process:

- The right not to be subject to any decisions wholly made on the basis of automated processing; and/or
- The right to request a review of any such decision, to be undertaken by a colleague in our recruitment team. You are also entitled to present any additional evidence or arguments to be considered by the colleague undertaking the review.

For any such requests, please email careers@lincolnshire.coop.

11. Changes to this privacy notice:

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.