



Applicant Privacy Notice

As part of any recruitment process, Orangebox collects and processes personal data relating to job applicants (whether this be as an employee, worker or contractor). As a “data controller”, Orangebox is responsible for deciding how we hold and use personal information about you.

We are committed to protecting the privacy and security of your personal information and to being transparent about how we collect and use this. The purpose of this Privacy Notice is to inform you how and why your personal data will be used – namely for the purposes of the recruitment exercise – and how long we will usually retain it for. Under the General Data Protection Regulation (GDPR) we are obliged to provide you with information on the following:

The data protection principles?

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.

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:

- Information you have provided in your curriculum vitae and covering letter or application form. This includes your name, title, address, telephone number, personal email address, date of birth, gender, employment history, skills, qualifications, right to work information, current level of remuneration.
- Information you provide during an interview.

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

- Race or ethnic origin, religious beliefs, sexual orientation.
- Health, including any medical condition, disabilities, health and sickness records.
- Criminal convictions and offences.

How we collect data about you

We collect personal information from you (the applicant), from any recruitment agencies we use and – once an offer is made – from your referee/s:

- The information from you comes via your:
 - o CV
 - o Letters
 - o Application forms
 - o Identity documents
 - o Interviews or assessments
- The information from recruitment agencies includes:
 - o Disclosure and Barring Service in respect of criminal convictions (DBS (only for specific roles where required))
- Your named referee/s would only be contacted once we'd made you an offer, and would be asked to confirm your previous employment history (as far as they are aware).

How we use information about you

We will use the information to:

- Communicate with you about the recruitment process.
- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Keep records related to our recruitment processes to demonstrate a fair and transparent process.
- Comply with legal or regulatory requirements, including checking a successful applicant's eligibility to work in the UK before employment starts.
- Decide whether to enter into a contract of employment with you.

It is in our legitimate interests to process personal data during the recruitment process, and so that we can keep an accurate record of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide on the winning candidate. We may also need to process data from job applicants to respond to and defend against legal claims.

Having received your CV and your covering letter or application form, we will process that information to decide whether you meet the basic requirements to be short listed for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we then 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 the role. If we decide to offer you the role, we will take up references upon your acceptance of our conditional offer of employment, which will be subject to receipt of satisfactory references.

Where there are specific checks needed for your particular role, such as the basic Disclosure and Barring Service (DBS) check for Installation & Service Engineers, we will inform you in a separate notice.

If your application is unsuccessful, we will keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before keeping your data for this purpose, and you are free to withdraw this at any time.

What happens if you fail to provide the personal information requested

If you fail to provide, when requested, information that 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 further.

How we use sensitive personal information

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 a test or interview.

How we use information about criminal convictions

We do not (for most posts) envisage that we will process information about criminal convictions. However, it is possible that you may bring something to our attention within the information you provide as part of the application process.

If you are applying for a role in Installation & Service or Finance we may 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 entitled to carry out a basic disclosure check to satisfy ourselves that nothing in your criminal convictions history makes you unsuitable for the role.

Finance roles in particular require a high degree of trust and integrity since they involve dealing with money, so we may ask you to seek a basic disclosure of your criminal records history.

If you are applying for a job as an Engineer you need to be aware that customers often require vetting to be done on those attending their premises to prevent terrorism. If you are conditionally offered such a post, you'll be asked to consent to searches into your background, including a basic 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.

Who has access to your data

Your information will be shared internally for the purposes of the recruitment exercise to relevant staff including members of the HR team, recruiting managers, and any other member of staff involved in the interview stages.

Automated decision-making

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

Data sharing with third parties

The only third parties with whom we'll share your data will be employment agencies, 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 only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions, and do not allow them to use your personal data for their own purposes.

The security measures we take

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, or 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 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.

How long we use your information for

We will retain your personal information for a period of six months after we have communicated to you our decision regarding whether or not to appoint you to a position.

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 job applicants 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 should a further opportunity arise in future 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.

Your rights in connection with your personal information

Under certain circumstances you have the right, by law, 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 to continue 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 that makes you want to object to processing on this basis. 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 HR Department in writing.
- **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 HR Department in writing.

Who do I contact for further information?

If you have any questions about this privacy notice or how we handle your personal information, please contact the HR Department.