Data Controller: WRAP, Ground floor, Blenheim Court, 19 George Street, Banbury, Oxon, OX16 5BH. 01295 819900

As part of our candidate application and recruitment process WRAP collects, processes and stores personal information about you. WRAP is committed to being transparent about how it collects and uses that data and to meeting its obligations under the General Data Protection Regulation (GDPR).

This document sets out:

- What information is collected.
- Why we collect your personal information.
- How it is processed within the recruitment process.

Throughout this Privacy Notice we use the term "processing" to cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.

What information does the organisation collect?

The organisation collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number.
- details of your qualifications, skills, experience and employment history.
- information about your current level of remuneration.
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.
- details about any unspent criminal convictions or pending cases.
- information about your entitlement to work in the UK.
- equal opportunities monitoring information, including information about your ethnicity, sexual orientation, gender identity and religion or belief.

The organisation may collect this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The organisation may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal

records checks. The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Why does the organisation process personal data?

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email). The organisation needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The organisation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

The organisation may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. The organisation processes such information to carry out its obligations and exercise specific rights in relation to employment.

Where the organisation processes other special categories of data, such as information about ethnicity, sexual orientation, gender identity or religion or belief, this is for equal opportunities monitoring purposes as permitted by the Data Protection Act 2018.

For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

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

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and those employees who are co-ordinating the recruitment process as part of their job role.

The organisation will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

The organisation will not transfer your data outside the European Economic Area.

How does the organisation protect data?

The organisation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. These policies and controls include the Data Protection Policy, Data Handling Policy and restricted access to this data as above.

For how long does the organisation keep data?

If your application for employment is unsuccessful, the organisation will hold your data on file for 12 months after the end of the relevant recruitment process. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request.
- require the organisation to change incorrect or incomplete data.
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Data.Protection@wrap.ngo.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

Unsolicited personal data

If we receive unsolicited CV's at a time when we are not recruiting, we will normally delete the CV and inform the candidate of this. If, however we do decide to hold unsolicited CVs on file for future recruitment rounds, we will inform the candidates of this, send out a copy of this privacy notice and inform them of their right to ask for the data to be deleted.

What if you do not provide personal data?

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

Automated decision-making

Recruitment processes are not based solely on automated decision-making.