



Data Protection Notice for Candidates

What is the purpose of this document?

MPM Bradford Limited is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information about you. You are required to view this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that 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:

- The information you have provided to us in your CV and covering letter
- The information you have provided on your application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, salary information, whether you have a driving license, whether you have eligibility to work in the UK and your notice period
- Any information you provide to us during an interview
- Any other information provided at your own choice, such as portfolios or references

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate
- Your named referees
- Engaged recruitment agencies

In certain circumstances, e.g. where security clearance may be required or you may be working with children and/or adults at risk, we may also collect personal information from a background check provider, credit reference agencies, the Disclosure and Barring Service and other third parties. Normally this would only be done after an offer has been made and we have discussed this with you.



How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role or any other suitable roles within our business
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process
- Keep records related to our hiring processes
- Comply with legal or regulatory requirements

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and covering letter or your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we 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 may then take up references and/ or carry out the checks described above before confirming your appointment.

If you fail to provide personal information

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. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- 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 to support your application process during a test or interview or workplace assessment.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting

Information about criminal convictions

We do not envisage that we will process information about criminal convictions, unless:

- We are legally required to carry out criminal record checks for specified roles or work
- The role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (*SI 1975/1023*) and is also specified in the Police Act 1997 (Criminal Records) Regulations (*SI 2002/233*) so is eligible for a standard or enhanced check from the Disclosure and Barring Service
- The role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history

In such cases, we may collect information about your criminal convictions. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

In some instances, we will ask additional specific questions as part of the application process which may lead to an automatic decision being made regarding your application. These questions will be related to essential criteria for the role in which you are applying for and will require a yes/no response.



Data sharing

Why might you share my personal information with third parties?

Except in the circumstances described below, we will only share your personal information with third parties 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 permit them to process your personal data only for specified purposes and in accordance with our instructions.

Data security

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 process your personal information only on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer.

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.

Data retention

How long will you use my information for?

We will retain your personal information for a period of two years after we have communicated to you our decision about whether to appoint you to 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.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and 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.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

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 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 Data Protection Officer at ben@mpmbradford.co.uk.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

The Data Protection Officer:

Ben Wilson (Business Leader)