Keltbray Holdings Ltd Job Privacy Notice

This is the Privacy Notice for Keltbray Holdings Limited and its subsidiaries for all applicants interested in pursuing career opportunities at Keltbray.

Introduction

This Privacy Notice sets out how we will use your personal data in accordance with the General Data Protection Regulation (GDPR) Articles 14 and 13. This includes the information you share about yourself, your rights, and your email preferences.

Our commitment

We commit to:

- Keeping your personal data safe and only processing it on a valid legal basis
- Keeping our records up-to-date and correcting inaccurate personal data where required
- Deleting your personal data after it is no longer for the purpose, we collected it for
- Assisting you in obtaining access to your personal data
- Not selling your personal data, and
- And giving you ways to manage and review your marketing choices at anytime

Who We Are

Keltbray Holdings Ltd as the company responsible for your data is the controller. If different to Keltbray Holdings Ltd we will let you know, which company in the Keltbray Group you have a relationship with.

You can contact our (DPO) at

The Data Protection Officer
Keltbray
St. Andrew's House
Portsmouth Road,
Esher Surrey.
KT10 9TA

Email: dataprotection@keltbray.com

Your personal data is any information relating to you from which you can be identified.

Your data:

We will process the following personal data:

When you create an account:

- Email address

When you create an account to set up and manage vacancies:

- Title
- Name
- Email address

- Address
- Mobile number
- Alternative contact number
- Current employment details including job title and salary
- Relevant skills and qualifications
- CV
- Answers to questions about your recruitment preferences

Current staff applying for another position

- Full contact details including address
- Line manager, role, grade, location
- Employment history
- Diversity and inclusion information

The website uses cookies to improve user experience by enabling the website to 'remember' you either for the duration of your visit or for repeat visits. The website also utilises cookies to monitor usage, analyse trends, and collect information about website usage. This helps in enhancing the overall performance of the website.

When you make an application, we may ask for:

- Full contact details, including address, mobile phone number
- Right to work status
- Employment history
- Qualifications, licenses and professional membership
- Diversity and inclusion information and reasonable adjustment requirements
- CV and personal statement
- Answers to competency, role specific questions

When you are invited for an interview, we may ask you to provide:

- Evidence of your identity and your right to work in the UK

When you undergo pre-employment checks, we may ask you to provide:

- Right to work including passport/visa/sponsorship details
- Contact details of your referees: by providing this information, you are happy for us to contact them if needed.
- Health assessment details
- Driver's license
- DBS and 5 years address check, if needed – project dependant

When you contact us for feedback and enquiries:

- Your email address
- Your name
- The details of your request

Purpose

Wherever we refer to "processing" of personal data in this Privacy Notice this includes any combination of the following activities: collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The purposes for which we are processing your personal data are**:**

- To manage recruitment for Keltbray Holding Ltd and its subsidiaries. This includes a job board, online application service, sift tests, interview scheduling, and pre-employment checks
- To assess your suitability for the role
- To enable the creation of user accounts
- To provide updates on the recruitment process
- For Keltbray Holdings Ltd employee candidate account, to allow users to view and apply for internal and across-holdings vacancies
- To offer job alert email services
- To offer technical support to candidates and recruiters
- To send your contract of employment to your email address
- To monitor the effectiveness of the recruitment process- this could include statistical analysis of system usage, research into the experience of the candidate and other system users, or analysis of referral sources to see which provides the most diverse applicant
- To build a database of users who wish to be considered for future career opportunities
- To undertake pre-employment checks and onboarding activities before you start in the role at Keltbray (including health pension questionnaires and character declaration)
- To comply with Baseline Personal Security Standard (BPSS) which consists of
    - Identity verification
    - Verification of national and immigration status-including your right to work in the UK
    - Verification of employment history- through cross-referencing against the HMRC PAYE system

Legal basis for processing

The legal bases for processing your data

- Contractual: it is necessary for the performance of a contract to which you are a party- an employment contract. This refers to information that we need to recruit and employ you.
- Contractual: it is required in order to act upon your request before signing an employment contract. This is a reference to the data that we gathered during the application and selection procedure.
- Legal obligations: it is necessary to comply with legal obligations placed on us as the data controller.
- Consent: it is necessary for carrying out digital right-to-work checks, personnel checks, work history checks, and in some cases participation in the user research interview.
- Legitimate interest: when it is our legitimate interest or the legitimate of the third party. In this context, we as a business have commercial reasons to process your personal data, but this must not unfairly go against your rights. If we rely on legitimate interest, we will tell you what that is.

Special category data/Sensitive data is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership and the processing of genetic data, and biometric data, to uniquely identify a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

The legal basis for processing your sensitive data is:

- it is necessary for performing or exercising our obligations or rights as a controller, or your obligations or rights as the data subject, under the employment law, social security law or the law relating to social protection. Personal information is processed to ensure that these requirements are met. We are required under the Equality Act 2010 to make appropriate reasonable adjustments for candidates with disability.
- it is necessary for the provision of a digital route for carrying out Right to Work checks, the legal basis for providing a digital version of your face and identity document is because you explicitly consent.
- it is necessary for the purpose of identifying or keeping under review the existence or the absence of equality of opportunity or treatment between groups or people specified (in paragraph 8(2) of Part 2 of Schedule 1 to the Data Protection Act 2018) in relation to that category with a view to enabling such equality to be promoted and maintained: and it is not carried out for the purpose of measures or decisions with respect to a particular data subject: and you have not declined consent: and you have not given notice that you don't wish your data to be processed for this purpose: and the processing is not likely to cause damage or substantial harm to the individual. Diversity and inclusion data, such as ethnicity, religion, community background, and sexual orientation, is used anonymously.

Recipients

Your personal data will be shared by us with:

Account data:

- our technical supplier and their approved staff
- our technical supplier's hosting provider
- profile may be shared with the recruiting department

Once you have made your application, your information may be shared with

- approved staff managing the vacancies (including recruiters, interview panels, HR & senior leaders)

If you meet the recruiting standards but the recruiting department is unable to offer you the job, you may be given the option to be added to the reserve list.

If you undergo the pre-employment checks prior to your appointment, your data may be shared with:

- KML Occupational Health Services
- Recruitment & HR department
- 3rd party vetting agency e.g. Experian
- The UK security vetting and/or regulatory organisations

Retention

Your data will be kept by us for the following duration:

- Application records and associated files for unsuccessful candidates (including CVs, third-party referee details, application letters, references, certificates of good conduct, job interview notes, assessments and psychological test results) will be deleted 12 months from the date documents were received.

- Application records and associated files for successful candidates (including CVs, third-party referee details, application letters, references, certificates of good conduct, job interview notes, assessments and psychological test results) will be deleted 6 months after the end of employment.

Candidate account- you can, at any time choose to close your account. This will:

- Remove access to your account
- Withdraw any ongoing application
- Discard incomplete applications that have not been submitted
- Disable the automatic job alert notification

Automated decision making

Your personal data will be subjected to automated decision-making when online psychometric tests are used. When undertaking a digital Right to Work check, your image will be automatically assessed. A living person will then validate this before final decisions are made.

Your rights

You have the right to access your personal data including us providing you without a charge, a copy (which may be in an electronic form) of any of your personal data that we are processing, or a third party is processing on our behalf. Also, note that your personal data can be viewed at the Application Centre at any time.

Request for this information or a copy of your personal data can be done by sending an email, enclosing proof of identification such as a copy of your passport, driving licence, or other documentation confirming your name and address (for example utility bill) to be addressed to:

The Data Protection Officer
Keltbray
St. Andrew's House
Portsmouth Road,
Esher Surrey.
KT10 9TA

Email: dataprotection@keltbray.com

You have the right to request that any inaccuracies in your data be rectified without delays

- You can edit your contact details at any time in the Application Centre
- You can also edit contact details on submitted applications
- You can also request a correction to any application you have submitted. **However, only minor changes are usually considered.**

You have the right to request that any incomplete data should be completed

- You can add additional contact details via your Application Centre at any time
- In most cases, you will be unable to complete your application if mandatory information is missing
- You are advised to check your application carefully before submitting it, as your application will be assessed based on the information you have provided at that point

You have the right to request that your personal data be erased if there is no longer a justification for processing it

- You can close your application at any time, from your Application Centre; this will
    - Withdraw any submitted application
    - Delete any unsubmitted applications
    - Stop any job alerts sent to you
    - Delete your account and remove your ability to log into your account
- Any application you have made in the past will be kept for audit purposes in line with our retention policy

You have the right to restrict the processing of your personal data in some circumstances (for example where accuracy is contested)

- If your data is restricted for processing, you cannot be considered for a job
- If it relates to your application, email the contact listed on the job advertisement
- If it relates to your account, contact [peoplesystemsupport@keltbray.com]

You have the right to object to the processing of your personal data, where it is processed for direct marketing purposes.

- Your data is not processed for direct marketing purposes

You have the right to object to the processing of your personal data:

- you can object to processing; however, you will then be unable to be considered for a job

You have the right to withdraw consent at any time when that has been asked of you.

You have the right in relation to automatic profiling to:

- ask that we do not make our decisions based on automated scores alone
- to object to an automated decision and ask that a person review it.

You have the right to receive from us the personal data that you have given us in a structured, commonly used and machine-readable format (“Right to data portability”) and/or have the data sent by us directly to another party. Please note that this right only applies in certain circumstances, which is when we held the data on the grounds of your consent, or to perform a contract with you or for steps preparatory to such a contract and we were processing the data by automated means.

Your request should be made to the address above

International Transfers

We may transfer your data outside of the UK and the European Economic Area (EEA); however, we will not do so without your permission. Some countries have adequate protection for personal data under their laws, where this is not the case, we will be responsible for ensuring that appropriate security and privacy safeguards are in place, either by requiring the recipients to have signed up to a recognised international data protection framework or by contractual arrangements.

Complaints

Please let us know if you are unhappy with how we have processed your personal data. You can contact us by contacting our Data Protection Officer.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) which is the UK supervisory authority for processing personal data. Further details are found on the ICO's website https://ico.org.uk

Alternatively, you can write to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number 0303 123 1113

Changes to this notice

Any changes we may make to this Privacy Notice in the future will be posted on this website, and where appropriate notified to you by email.
Regularly reviewing this page ensures that you are always aware of what information we collect, how we use it under what circumstances, and under what circumstances we will share it with other parties.