

As part of the any recruitment process, Hawthorn collects and processes personal data relating to job applicants. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information do we collect?

Hawthorn 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, experiences and employment history
- Information about your current level of remuneration, including benefits entitlements
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process
- Information about your entitlements to work in the UK

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

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems or other IT systems such as emails.

Why does Hawthorn process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process data to enter into a contract with you. In some cases, we need to process data to ensure that we are complying with its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts.

Hawthorn has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from the job applicants allows us to manage the 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 the job applicants to respond to and defend against legal claims.

We may also process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Hawthorn may 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 it keeps your data for this purpose and you are free to withdraw consent at any time.

Who has access to the data?

Your information may be shared internally for 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 IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to



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obtain references for you, employment background checks providers to obtain necessary background checks.

How do we protect data?

We take the security of your data seriously. We have 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 employers in the proper performance of their duties.

For how long do we keep data?

If your application for employment is unsuccessful, if applicable, the organisation will hold your data on for six months after the end date of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed. You will be asked when you submit your CV whether you give us consent to hold your details for the full 12 months to be considered for other positions or not.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your HR file (electronic and paper based) 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 several 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 Hawthorn is relying on its legitimate interests as the legal ground for processing
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

All questions, comments and requests regarding this Privacy Notice should be addressed to **Suzie Kalsi, HR Manager**.