

JOB APPLICANT PRIVACY STATEMENT

Data Controller: Jo Monk, Director of People and Development, Lapithus Hotel Management Limited, Holiday Inn Heathrow M4 J4, Sipson Road, West Drayton, Middlesex, UB7 0HP

What information does the Company collect?

The Company collects and processes a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number, date of birth;
- Details of your qualifications, skills, experience and employment history;
- Information about your current level of remuneration, including benefits entitlements;
- Whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK; and
- Information about previous criminal sanctions.

The Company collects this information in a variety of ways. For example, data might be contained in applications forms, CV or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

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

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).

Why does the Company process personal data?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Company 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 commences.

The Company 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 Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend legal claims.

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

The Company processes health information if it needs to make a reasonable adjustment to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

The Company is obliged to seek information about criminal convictions and offences. Where the Company 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 Company will keep your personal data on file in case there are future employment opportunities for which you may be suited. The Company 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 will be shared internally for the purposes of the recruitment exercise. This includes members of the People & Development 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.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you.

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

How does the Company protect data?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

The internal policies and controls currently adopted by the Company to protect your data are:

- Internal IT policy to ensure that all data is shared in a safe and effective manner;
- Systems restrictions in that all usage of our internal systems are monitored and access is given in relation to the role an individual carries out to ensure that information is not misused;
- Attachments are sent encrypted wherever necessary;
- Access to internal systems are password protected;
- Third party providers are thoroughly checked to ensure they have effective mechanisms in place to protect our employee's data.

For how long does the Company keep data?

If your application for employment is unsuccessful, the Company will hold your data on file for 6 months after the end of the relevant recruitment process. At that 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 Company 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 Company is relying on its legitimate interests as the legal ground for processing; and
- Ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

You can make a subject access request by completing the Company's form for making a subject access request.

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

What if you do not provide personal data?

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

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Automated decision-making

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