



KEY DETAILS

Policy Owner	Head of HR
Review Interval	Annual
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DATE	BY	VERSION	REASON FOR CHANGE
May 2018	Data Protection Officer	1.0	Policy Created
November 2019	Data Protection Team	2.0	Annual review. General Update & Rebrand

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Introduction

We are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect, store and use personal information about you during our recruitment and selection process. This privacy notice covers candidates applying for jobs in our stores, warehouses and head office. It is important that you read this notice so that you are aware of how and why we are handling the personal information we are collecting, storing and using about you. Your rights over your personal information and how to exercise those rights is also set out in this privacy notice.

Who We Are

We are a group of companies which includes Mamas & Papas Limited, Mamas & Papas (Stores) Limited, Mamas & Papas (Digital) Limited, Mamas & Papas (Concessions) Limited and Mamas & Papas (Holdings) Limited (collectively called “Mamas & Papas”). Each is a Data Controller responsible for deciding how your personal information is collected, stored and used.

We have appointed a data protection officer whose contact details are below.

What Information Do We Collect?

We collect, store and use the personal information that you provide to us in your CV and covering letter, that you have provided as part of our application process (including when you set up a profile on our recruitment system); and, where it is a requirement of the role, confirmation of whether you hold a full UK driving licence. We also collect, store and use personal information given to us by recruitment agencies (if applicable).

We use job boards and sites to advertise our vacancies. Where you apply for one of these jobs we will collect, store and use personal information provided to us by the job board/site together with that which you provide direct to us. The information provided by the job board/site is likely to include CV, e-mail address, telephone number, current job title, current location and current salary. Where you have started an application but not yet completed it, the access granted to us by job boards and sites may mean that we have sight of your application. If you would like further information on how your personal information is processed by job boards and sites and what information they provide to us, please review their privacy notice.

We may also collect, store and use sensitive personal information such as if you are based in Northern Ireland we will ask you to confirm your gender and religion if we are required to do this by law. In addition, if you choose to complete our equality opportunity questions we will collect this information, anonymise it and retain it for monitoring purposes.

At the telephone interview stage, we will contact you to ask if you require any reasonable adjustments. If these are required, we will collect, store and use information about any relevant medical condition or disability you have for only this purpose. This is also applicable for the face to face interview stage.

We will collect information about your right to work in the UK. We may also collect additional information such as current salary and notice period during the interview. If you have applied for a role which requires a full driving licence, we will take a copy of your licence as part of the interview.

Once we have offered you a role, we will need to collect, in addition to the above, your emergency contact details such as their name, telephone number, mobile number, work number, relationship to you, address and postcode. We will also collect information about your previous income, pension and any Jobseekers Allowance you might receive, your National Insurance number, information about your student loan if you have one and bank account details including your account number.

Additionally, we will collect, store and use personal information from your referees about your previous employment history, including the name of your previous employer, the position you held, your start and leaving dates, your annual salary upon leaving and your reason for leaving.

We will also collect, store, and use more sensitive, special categories of personal information such as details of any medical condition or disability where it is necessary to make appropriate provisions for you to undertake the role.

How Long Do We Keep Your Information For?

If your application is unsuccessful, we would like to match you to any other live vacancies. If you consent, a member of our recruitment team will use your personal information to match you to any other suitable vacancy without you needing to reapply for up to 12-months.

We will ask you if you would like to keep your personal information - CV, e-mail address and contact telephone number - on our system. If you consent, your profile on our recruitment system will remain active. You will then be able to submit future applications without the need to resubmit your personal information for as long as your profile is active.

Alternatively, you can register to hear from us in relation to our latest vacancies. We will collect, store and use your e-mail address and vacancy preferences in order to send you tailored vacancy alerts. We will contact you every 12 months to see if you would like your alerts kept active.

How We Will Use Your Information

We will use your data as part of our recruitment process to:

- comply with employment law and other legal obligations;
- assess your skills, qualifications and suitability for the role to determine whether to interview you;
- arrange and conduct interviews;
- communicate with you about the recruitment and selection process;
- decide and communicate the outcome of your application;
- determine the terms on which to employ you;
- carry out verification and vetting;
- obtain references on you;
- deal with any legal disputes involving you; and
- keep records relating to our hiring processes.

Our legal basis for doing this is that it is necessary for taking steps prior to entering into a contract and for compliance with legal obligations to which we are subject.

If you choose to complete our equality opportunity questions, our legal basis is you have given your consent.

What Happens If I don't Provide My Personal Information?

It is a legal requirement for us to contract with you. If you don't provide the personal information we need, we may not be able to continue with our recruitment and selection process or a job offer e.g. if you don't give us details of your eligibility to work in the UK we cannot employ you.

If you have any concerns about whether you need to provide the personal information, please contact our Data Protection Officer.

Automated Decision Making

We will make some automated decisions about whether to progress your application. This means there will be no human involvement and the decision will be based upon your answers to vacancy specific questions which we ask you to complete as part of our recruitment process. Due to the large amount of applications we receive for jobs, we have designed our system to automatically reject any application where the minimum requirement of correct answers is not given.

This is also applicable if you are unable to provide a UK driving licence if it is a requirement for the role.

Who We Share Your Information With

We will only share the personal information that you give us with the following third parties and for the following reasons:

- If you are applying for a senior role in our company we may share your personal information with BlueGem Capital Partners LLP who are investors in the Mamas & Papas group. We share your personal information with BlueGem on the basis that they are involved in managing and approving our senior recruitment and selection
- companies who provide support for our internal IT systems and our applicant tracking systems provider - we use reputable third parties to provide us with our IT systems and support for them. They may access your personal information to the extent that they need to in order to provide their services.
- a company that we merge with or transfer our business assets to - in the event that we sell all or part of our business, or merge with another company, we may transfer personal information that we have collected as described in this notice, along with our other business assets, to the company that we are selling to or merging with.
- entities, organisations or individuals outside our group for legal reasons - we will share your personal information with entities, companies or individuals outside our group where this is necessary to comply with any law, rule, regulation, legal procedure or governmental request that is applicable to us.

- entities, companies or individuals outside our group to obtain advice – we may share your personal information with external professional advisors such as lawyers or accountants in order to take advice and for the purposes of legal and tribunal proceedings. The legal basis for this is that it is in our legitimate interests as a business to be able to obtain professional advice from our external advisors about issues that may arise within our business. We will only disclose such personal information to any third party as is necessary to enable them to carry out the function or purpose for which it is disclosed.

Data Protection Principles

We will only ever process your information in a Lawful, Fair and Transparent manner and only collect that which we need as a minimum to carry out processing. We will only use your information for the purposes we have outlined to you, and not in any way that is incompatible with those purposes.

With your help, we can keep these records accurate and up to date. We only keep your data for as long as we are required to in line with our Records Retention Policy, which is based upon legislative requirements and/or we have a business case for doing so.

You can be assured that we will keep your information secure in line with our technical and organisational measures to protect data.

Where Information May Be Held

Data will be stored in our applicant management system.

Information may be held at our registered offices, and third party agencies, service providers, representatives and agents. We do not currently transfer information outside of the European Economic Area (EEA).

Your Rights

The GDPR/ Data Protection Act gives you certain rights in respect of the personal data that we hold:

- You have the right to access your personal data that we hold on you including how it is processed and if we have shared it with Third Parties;
- You have the right to require us to rectify any inaccurate personal data we hold concerning you;
- You have the right to request that your data is deleted (Right to be Forgotten) which we will only object to if there is a legal or business case for keeping the information;
- You also have the Right to Data Portability, where we will provide you with your information in a commonly used machine readable electronic format; and
- You have the right to object to processing of personal data if you feel we are not processing it in a fair and transparent manner. We can refuse to cease processing where we have a compelling legitimate ground that outweighs your interests, or if we need the data to bring or defend a legal claim to which we will keep you fully informed.;
- You have the right to require us to restrict the processing of your personal data on certain grounds, including where:

- you contest the accuracy of the personal data and want us to restrict processing of your personal data while we verify its accuracy;
- the processing is unlawful, but you request a restriction of the processing rather than erasure;
- we (as controller) no longer need the data for the purposes of the processing, but you have told us you require us to retain that personal data for you to establish, exercise or defend legal claims; or
- you have objected to us processing your personal data on grounds of legitimate interests and want us to restrict processing of your personal data while we consider your objection.

If you would like to exercise any of these rights, please contact the Data Protection Officer.

How to Complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/make-a-complaint/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

DPO Contact Details

The Data Protection Officer is situated at Head Office:

Mamas & Papas
Colne Bridge Road,
Huddersfield
HD5 0RH

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