

KEITS Training Services Ltd. is committed to adhering to the GDPR (General Data Protection Regulations), this means that we are transparent about why we request certain data from you and what we do with that data.

What is the GDPR?

The GDPR is new legislation which supersedes the Data Protection Act as of May 25th 2018.

“The EU General Data Protection Regulation (GDPR) replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens’ data privacy and to reshape the way organizations across the region approach data privacy”.

In accordance with the General Data Protection Regulation (GDPR), KEITS Training Services Ltd have implemented this privacy notice to inform you, as prospective employees of our Company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- Processing is fair, lawful and transparent.
- Data is collected for specific, explicit, and legitimate purposes.
- Data collected is adequate, relevant and limited to what is necessary for the purposes of processing.
- Data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay.
- Data is not kept for longer than is necessary for its given purpose.
- Data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures.

Types of data we hold

We keep several categories of personal data on our prospective employees in order to carry out effective and efficient processes. We keep this data in recruitment files relating to each vacancy and we also hold the data within our computer systems.

Specifically, we hold the following types of data:

- Personal details such as name, address, phone numbers.
- Your photograph.
- Your gender, marital status, information of any disability you have or other medical information.
- Right to work documentation.
- Information on your race and religion for equality monitoring purposes.
- Information gathered via the recruitment process such as that entered into an application form, CV or included in a cover letter.
- References from former employers.
- Details on your education and employment history etc.
- Driving licence.
- Criminal convictions.

Location	Title	Responsibility	Date Created	Version/up dated	Review Date
Staffing/staffing docs & personnel forms	Privacy Notice for KEITS Job Applicants	CS	04.18	1	04.19

Collecting your data

You provide several pieces of data to us directly during the recruitment exercise. In some cases, we will collect data about you from third parties, such as recruitment agencies and former employers when gathering references.

Should you be successful in your job application, we will gather further information from you, for example, your bank details and next of kin details, but only once your employment begins.

Lawful basis for processing

The law on data protection allows us to process your data for certain reasons only. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Making decisions about contractual benefits to provide to you	Our legitimate interests
Assessing training needs	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests

Special categories of data

Special categories of data are data relating to your; health, sexual orientation, race, ethnic origin and religion.

We carry out processing activities using special category data; for the purposes of equal opportunities monitoring and/or to determine reasonable adjustments.

Most commonly, we will process special categories of data when the following applies:

- You have given explicit consent to the processing
- We must process the data in order to carry out our legal obligations
- We must process data for reasons of substantial public interest
- You have already made the data public.

Failure to provide data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of making recruitment decisions in relation to both initial and subsequent employment e.g. promotion to process this data.

Location	Title	Responsibility	Date Created	Version/up dated	Review Date
Staffing/staffing docs & personnel forms	Privacy Notice for KEITS Job Applicants	CS	04.18	1	04.19

Who we share data with

Employees within our company who have responsibility for recruitment will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data is not shared with third parties without your knowledge and consent. We may share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Retaining your data

- We keep your data in relation to unsuccessful candidates for **six months** once the recruitment exercise ends.
- If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will retain your data for **12 months**. At the end of this period, we will contact you and delete or destroy your data, unless you consent for us to keep it further.

If you have reached the time limit, or have already withdrawn your consent to our processing of your data, it will be deleted or destroyed. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you on induction.

Your rights

You have the following rights in relation to the personal data we hold on you:

- The right to be informed about the data we hold on you and what we do with it.
- The right of access to the data we hold on you. We have a Subject Access Request policy and all such requests will be dealt with accordingly.
- The right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification'.
- The right to have data deleted in certain circumstances, this is also known as 'erasure'.
- The right to restrict the processing of the data.
- The right to transfer the data we hold on you to another party, this is also known as 'portability'
- The right to object to the inclusion of any information.
- The right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

Who are the ICO? – The information Commissioners Office are the UK's independent authority set up to uphold information rights in the public interest <https://ico.org.uk>

If you have any issues or would like further information then please contact KEITS Head Office 0208 327 3800 or info@keits.co.uk

Location	Title	Responsibility	Date Created	Version/up dated	Review Date
Staffing/staffing docs & personnel forms	Privacy Notice for KEITS Job Applicants	CS	04.18	1	04.19