

Candidate Privacy Notice

What is the purpose of this notice

We are committed to protecting your privacy and security of your personal information and complying with all data protection legislation including the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR).

We are a “Data Controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor).

This Privacy Notice applies to all candidates that apply to work for the ColX Group (comprising of ColX Ltd, Equita Ltd, Jacobs Enforcement Ltd, Ross & Roberts Ltd and Stirling Park LLP) and makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the Data Protection Act 2018 (DPA18) and General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you.

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter
- Any information you provide to us during an interview
- Information relating to Driving Convictions, Disclosure and Barring Service and the Register of County Court Judgements / Register of Judgements

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate
- Information obtained through recruitment agencies including your name, phone number, address, role applied for, email address, information provided by you in your C.V. and answers to questions we ask including eligibility to work in the UK, if you are in arrears with your Council Tax and if you have any outstanding County Court Judgements / Decrees or Warrants / criminal convictions
- GB Group PLC, from which we collect the following categories of data: Judgements
- Disclosure and Barring Service in respect of criminal convictions
- Your named referees, from whom we collect the following categories of data: Name, position applied for, how your referee knows you, job title and dates; information relating to: sickness; warnings; investigations in your role, details of any aggressive behaviour, if your referee would recommend you in the role, and any other comments. They are also asked to rate as Excellent, Good, Satisfactory or Poor your honesty; reliability; motivation; flexibility; communication and initiative
- The following data from third parties is from a publicly accessible source Facebook, LinkedIn, X (formerly Twitter) and Instagram

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process
- Keep records related to our hiring processes
- Comply with legal or regulatory requirements

It is in our legitimate interests to decide whether to appoint you to the role, since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract [of employment] with you. Having received your CV and covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to offer you an interview, we will use the information you provided to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references AND/OR carry out a criminal record AND/OR carry out any other check as listed earlier before confirming your appointment.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

Data Sharing

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: Register of County Court Judgements / Register of Judgements; Driving Licence Vehicle Agency; Disclosure and Barring Service. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

Data Retention

How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to the role unless you ask us to destroy it immediately. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy OR applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Rights of Access, Correction, Erasure and Restriction; Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

Right to withdraw consent

On the date you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO or Data Privacy Manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Acknowledgement of Candidate Privacy Notice

By submitting an application to ColX Group or associated companies (comprising of ColX Ltd, Equita Ltd, Jacobs Enforcement Ltd, Ross & Roberts Ltd and Stirling Park LLP), you, the candidate, acknowledge that you have received a copy of ColX Group's Candidate Privacy Notice as part of the role application details, and that you have read and understood it.

Approvers



Paula Jacobs
Chief Operating Officer
(Director)



Simon Jacobs
Chief Executive Officer
(Director)