

# Job Applicant Privacy Policy

This policy explains the basis on which we collect use and disclose the personal data of job applicants as part of our recruitment process, as well as your rights in respect of such personal data to ensure you are informed and are confident about giving us your information.

## Who are we?

Throughout this Policy the words ‘we’, ‘us’ or ‘the company’ or ‘IFMG’ refers to Incentive FM Group Limited (including Incentive FM Limited Incentive QAS Limited, Incentive Tec Limited, SWC Limited, Incentive Fire & Security Limited, Incentive FM Consultancy Limited ‘the company’.

## What information does the company collect and how?

IFMG collects a range of information about you, this includes:

- your name address and contact details including email address and telephone number.
- dates of your qualifications, skills, experience and employment history.
- information from interviews, including any telephone screening interviews you may have.
- information about your current level of remuneration, including benefits entitlements.
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin sexual orientation, health and religion or belief.

We may collect this information a variety of ways for example data might be contained in application forms or CVS (including when these are sent to us as part of speculative applications) or queries obtained from your passport or other identity documents or collected through interviews or other methods of assessment.

We may also collect information about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer has been made to you. Data will be stored in a range of different places, including on your application record, in HR management systems and our email system.

## Why does IFMG process personal data?

IFMG collects and processes your data for a number of reasons and where we have a legal basis to do so, as follows:

IFMG 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 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 job applicants to respond to and defend against legal claims. In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant’s eligibility to work in the UK before employment starts and for certain roles there may be additional background checks required as part of the screening process.

IFMG may process information about whether or not applicants disabled so that we can make reasonable adjustments for candidates who have a disability. Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or origin or belief, this is for equal opportunities monitoring purposes. The processing of these types of data will be carried out to ensure you or us can meet our obligations or exercise our rights under law related to employment or to enable us to establish exercise or defend legal claims.

We will not use your data for any act purpose other than the recruitment process of which you are a part.

## Who has access to data?

Your information may be shared internally within the company for the purpose of the recruitment process.

This includes members of the HR team, interviewers involved in the recruitment process and managers in the business area with a vacancy. We will not share your data with third parties unless your application for employment is successful and an offer of employment is made. We will then share your data with former employers in order to obtain references.

We may also share your data with other Group companies for business performance and other types of monitoring and management purposes. If you are applying for senior management position with us, we may share your data with board directors.

In addition, we may need to share your personal information with the regulator or otherwise to comply with the law.

## How does IFMG protect data?

IFMG takes the security of your data seriously. We have internal policies and controls in place to ensure your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except via personnel in the proper performance of their duties.

## How long does the IFMG keep the data?

If your application for employment is unsuccessful (including when you have speculatively applied to us in respect of a role which is not available), we will hold your data on file for six months. At the end of that period, your data is deleted or destroyed brackets (unless we need to retain it for longer to exercise or defend any legal claims). 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 employee data is held will be provided to you in a separate privacy notice .

## Your rights

As a data subject you have a number of rights under data protection law. You can:

- access and obtain a copy of your data on request.
- require IFMG to change incorrect or incomplete data.
- require IFMG to delete or to stop processing your data, for example where the data is no longer necessary for purposes of processing.
- object to the processing of your data where IFMG is relying on its legitimate interests as a legal ground processing; or
- ask us to transfer your data to another organisation.

If you would like to exercise any of these rights or if you have any questions about this notice or the processing of your data more generally, please contact: [Dataprotection@incentive-fm.com](mailto:Dataprotection@incentive-fm.com)

If you believe that the company has not complied with your data protection rights you can complain to the ICO (Information Commissioners Office): <https://ico.org.uk/concerns/>

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to IFMG during the recruitment process however if you do not provide the information, we may not be able to process your application.