



## JOB APPLICANT PRIVACY NOTICE

**Data Controller:** Hostelling Scotland  
Head Office, 7 Glebe Crescent, Stirling, FK8 2JA  
Tel: 01786 890400

### About Privacy Notice

As part of any recruitment process, Hostelling Scotland collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

This privacy notice describes how we collect and use personal information about you during the recruitment process with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all applicants including those who send their speculative applications to us.

Hostelling Scotland is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

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.

### What information do we collect and process?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We collect and process a range of information about you, including 'special categories' of more sensitive personal information.

The categories of personal data we will collect, store and use about you includes:

- your name, address and contact details, including email address and telephone number;

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- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Hostelling Scotland (if applicable) and information included in a cv or cover letter as part of the application process, training records and professional memberships;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
- information about your criminal record;
- information about your entitlement to work in the UK.

We may collect this information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents or collected through interviews or other form of assessments including practice tests and presentations.

We may also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks. We will seek information from third parties only once a verbal job offer to you has been made and will inform you that we are doing so.

### **Why do we process personal data?**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to process data to take steps at your request prior to entering into a contract with you.
2. Where we need to process your data to enter into a contract with you.
3. Where we need to comply with a legal obligation.
4. Where it is necessary for our legitimate interests (or those of a third party) 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 and on what terms. We may also need to process data from job applicants to respond to and defend against legal claims.

We may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out our obligations and exercise specific rights in relation to employment.

For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

We will not use your data for any purpose other than the recruitment exercise for which you have applied unless we have your prior agreement, for example, to keep your details on file in respect of future vacancies.

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### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, 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 we make you an offer of employment. We will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and Disclosure Scotland to obtain necessary criminal records checks.

We will not transfer your data outside the European Economic Area.

### **How do we protect data?**

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Where we engage third parties to process personal data on our behalf (such as a recruitment agency), they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

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.

### **For how long do we keep data?**

If your application for employment is unsuccessful, we will hold your personal data on file for as long as necessary to fulfil the purposes we collected it for, usually six months after the end of the relevant recruitment process. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. At the end of the retention period, 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 separate Employee Privacy Notice.

It is not our standard policy to accept speculative applications and ask such candidates to apply for live vacancies which are advertised on our website, providing link to our website for information of our current job listings. Accordingly we will delete their emails with CVs/applications.

We may however wish to keep specific speculative candidate's CVs/applications as their background /skills /competency would be potentially suitable for a role that could be difficult for us to recruit. In this instance, we will contact you to seek your permission first to allow us



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to keep your personal data on file for six months. As part of this, we may also wish to forward your speculative application to relevant recruiting manager for future suitable employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

We do not accept unsolicited queries or applications from a recruitment agency or third party agent, with whom Hostelling Scotland does not have formal agreement for engagement through our Human Resources in order to process candidate personal data on our behalf. Any such applications will not be reviewed, and be deleted or destroyed.

### Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- request Hostelling Scotland to change incorrect or incomplete data;
- request Hostelling Scotland to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- request restriction of processing of your data; and
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing.

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

### No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### 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 data protection officer:

Data Protection Officer  
Hostelling Scotland  
Head Office  
7 Glebe Terrace, Stirling  
FK8 2JA  
E: [gdpr@hostellingscotland.org.uk](mailto:gdpr@hostellingscotland.org.uk)



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### **What if you do not provide personal data?**

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

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **Contact for queries**

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you have any queries about the process or how we handle your information, please bring your concerns to our attention without any delay so that we can deal with your concerns and queries.

We would also welcome any suggestions for improving our process and procedures. Please contact Human Resources Manager on [recruitment@hostellingscotland.org.uk](mailto:recruitment@hostellingscotland.org.uk).

If you however believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF  
T: 0030 123 1113

We keep our privacy notice under regular review. We reserve the right to update this privacy notice at any time, and we will provide information about a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This privacy notice was last updated on 24 May 2018