
CANDIDATE PRIVACY NOTICE

Data controller: James Carter, CEO

As part of any recruitment process, Touchdown 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.

What information do we collect?

Touchdown collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- 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; and
- information about your entitlement to work in the UK.

We may collect this information in a variety of ways. For example, data might be contained in CVs or cover letters, obtained from your passport or other identity documents, or collected through interviews or other forms of evaluation, including writing assessments.

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

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does Touchdown process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

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.

Touchdown 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.

We may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the senior management and HR and recruitment teams, interviewers involved in the recruitment process and managers in the business area with a vacancy if access to the data is necessary for the performance of their roles.

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.

As we operate globally across Europe and the US, your data may be transferred to and processed in Europe and in the US. We maintain and apply employment data protection standards consistent with those specified in this Notice to our operations globally.

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.

For how long do we keep data?

If your application for employment is unsuccessful, we will hold your data on file for twelve months from the date of your initial application. If you agree to allow us to keep your personal data on file, we may inform you of future job openings that match your profile. At the end of that period or once you withdraw your consent, your data is deleted or destroyed except such brief details (e.g. your name) for our recruitment records.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your HR file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

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

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

If you would like to exercise any of these rights, please contact our HR Manager, Lisa Dixon at ldixon@touchdownpr.com.

If you believe that Touchdown has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Touchdown 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.

Automated decision-making

Our recruitment processes are not based solely on automated decision-making.