

## **GDPR Candidate Privacy Notice**

### **What is the Purpose of this document?**

This privacy notice describes the types of personal data we collect about job applicants, how we use this information, with whom we share it, and the rights of applicants regarding our use of their information.

### **Data Controller**

Farnborough Airport Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice 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 UK General Data Protection Regulation (GDPR).

### **Data Protection Principals**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for the purpose of 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.
- Any information provided by your referees.

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

- 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.

- A recruitment agency or educational institution, from which we may collect certain information in your curriculum vitae and information you have the agency for their record such as your name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we may collect certain information to confirm the information you have provided us and/or the recruitment agency or educational institution, such as employment history and qualifications.

### **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 work or 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 process your personal data to decide whether to appoint you since it would be beneficial to our business to appoint someone to that relevant 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 call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role or work. If we decide to offer you the role or work, we will then take up references and carry out a criminal record and/or carry out any other necessary check before confirming your appointment.

### **If you fail to provide personal information**

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 driving license 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 due to our CAA legal requirements.

### **How we use particularly Sensitive Personal information**

We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.

### **Information about Criminal Convictions**

We will collect certificates from the DBS. We are required to carry out a criminal record check to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. We are legally required by the CAA to carry out criminal record checks to be able to issue an airport pass.

We have in place appropriate safeguards which we are required by law to maintain when processing such data.

### **Automated Decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **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: the security company in place on the airport. 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 12 months after we have communicated to you our decision about whether to appoint you to the role. 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 applicable laws and regulations.

### **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 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 our Data Protection Officer in writing.

## LAWFUL BASIS FOR PROCESSING

- Proving information to apply for the role – Legitimate Interest.
- Information provided for interview stage – Legal requirement.
- Personal data provided and not progressed – Legitimate Interest.
- Criminal background checks – Legal Requirement.

## DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) 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:

Email: [DPO@farnboroughairport.com](mailto:DPO@farnboroughairport.com)

Postal Address: DPO, Farnborough Airport, Farnborough, Hampshire, GU14 6XA.

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: <https://ico.org.uk/global/contact-us/>. We have appointed IT Governance Europe Limited to act as our EU representative. If you wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR), or have any queries in relation to your rights or general privacy matters, please email our Representative at [eurep@itgovernance.eu](mailto:eurep@itgovernance.eu) Please ensure to include our company name in any correspondence you send to our Representative.

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