

Recruitment Privacy Notice

What is the purpose of this document?

Edinburgh Food Project (SC043220) 12 New Lairdship Yards, Edinburgh, EH11 3UY ("**we**", "**our**", "**us**", or "**Charity**") is a "controller" in relation to personal data. 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). It 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 (UK GDPR).

Data protection principles

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 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:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, skills/experience, and qualifications.
- Any information you provide to us during the recruitment process and/or the interview.
- If you contact us, we may keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.

We may also collect, store and use the following types of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, gender identity.
- Information about your health, including any medical condition, disability, health and sickness records.

How is your personal information collected?

We collect personal information about candidates from the following sources depending on how you apply for the role:

- You, the candidate.
- Recruitment agencies, from which we may collect the following categories of data: name and contact details, CV or application form (where applicable), any details you provide to such recruitment agencies such as information related to your candidate account/profile.
- Your named referees, from whom we collect the following categories of data: contact details of the referee and any information they may provide to us about you.
- Data from third parties that is from a publicly accessible source such as LinkedIn and other social media profiles and jobsites or databases. We may also receive your personal data from a third party who recommends you as a candidate for a specific role opening or for our Charity more generally.

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 you have applied for or for other roles.
- To enhance any information that we receive from you with information obtained from third party data providers.
- Check you are entitled to work in the UK.
- Undertake any necessary background checks of applicants.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We rely on legitimate interests as the lawful basis to process your personal in order to facilitate the recruitment process and to decide whether to appoint you in the role. Our legitimate interests are the recruitment of staff for our Charity.

We also need to process your personal information to decide whether to enter into a contract of employment with you. In some cases we rely on performance of a legal obligation to process your personal data e.g. checking you are entitled to work in the UK under the Immigration, Asylum and Nationality Act 2006.

Having received your CV and covering letter or your application form (as applicable) 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. If we decide to offer you the role, we will then take up references 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.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- 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 for the interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, disability to ensure meaningful equal opportunity monitoring and reporting.

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- In limited circumstances, with your explicit written consent.
- Where it is necessary for the purposes of carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Where it is necessary for reasons in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.
- Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

In addition, we rely on processing conditions at Schedule 1, Part 1, paragraph 1(1)(a); Schedule 1, Part 1 paragraph 2(2)(a); and Schedule 1 part 2 paragraph 8(1) (b) of the Data Protection Act 2018. These relate to the processing of special category data for employment purposes, or processing of personal data revealing race, religious beliefs, health or sexual orientation for the

purposes of promoting equality of treatment. We do so in accordance with our appropriate policy document.

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 share your personal information with the following third parties for the purposes of processing your application: our third party services providers in administration, HR consultants, IT and security services, and/or referee's, professional advisors. All our third-party service providers 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 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.

Transferring personal data outside the UK

We do not transfer the personal data we collect about you outside the UK.

How long we retain your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal data are available in our Retention Policy. 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. Taking this into account we keep recruitment records for unsuccessful applicants for six months following notification of outcome of recruitment exercise. If we wish to keep your CV on file for future roles, we will ask for your consent. For successful applicants, we will keep your personal data for longer in

line with our employee/volunteer retention guidelines set out in our retention policy. We will inform you of this in our employee privacy notice.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the Charity we will retain and securely destroy your personal data in accordance with our data retention policy and applicable laws and regulations.

Your rights over your data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

Should you need to contact us in respect of your personal rights, please contact our data protection officer (DPO) DPO@edinburghfoodproject.org.

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

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data 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 data 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 data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data 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 data 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 data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

You will not have to pay a fee to access your personal data (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.

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 data is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO: DPO@edinburghfoodproject.org.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a 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: DPO@edinburghfoodproject.org. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues.

We reserve the right to update this Privacy Notice at any time, and we will provide you with 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.

Last updated: November 2023