

#### **Recruitment Privacy Policy**

As part of our recruitment process, the Company collects and processes personal data in connection with your application for work with us. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

## What information does the Company collect?

It 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 the firm needs to make reasonable adjustments during the recruitment process;
- 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 collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment including psychometric tests. Recruitment agencies also regularly provide personal data, primarily in the form of candidate CVs.

The Company will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is 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).



## How will the Company use information about you

Ocean Holidays 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 decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that vacancy.

We will also need to process your personal information to decide whether to enter into a contract of employment with you.

### Why does the Company process personal data?

It needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal and regulatory obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from candidates allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Company processes special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is



done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time.

For some roles, the Company is obliged to seek information about criminal convictions/offences, and also about financial probity. Where it seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The Company will not use your data for any purpose other than recruitment. If your application is unsuccessful, it may keep your personal data on file for up to 12 months in case there are future employment opportunities for which you may be suited. You are free to withdraw your consent to this retention of data at any time.

#### Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, other recruitment decision-makers in the Company and the IT department if access to the data is necessary for the performance of their roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you, employment background check providers and (where required) regulatory bodies to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

We do not envisage that we will transfer your data outside the European Economic Area.

## How does the Company protect data?

The Company takes the security of your data seriously. It has 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 does the Company keep data?

If your application for employment is unsuccessful, we will hold your data on file for up to 12 months after the end of the relevant recruitment process. At the end of that period, or if you withdraw your consent to retain the information during the period, your data is deleted or destroyed.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

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. Should you leave our employment, your data will be held for 6 years.

If you accept an offer of employment with us and complete all the relevant forms and then subsequently decide not to join us, your data will be deleted immediately.

### 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 the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is
  a dispute about whether or not your interests override the Company's legitimate
  grounds for processing data.

If you would like to exercise any of these rights, please contact a member of the Recruitment Team or our Data Protection Officer, dpo@ocean-holidays.co.uk

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



# Automated decision-making

Recruitment processes are not based solely on automated decision-making.

## Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time.