

Recruitment Privacy Notice  
of  
Scottish Friendly Assurance Society Limited

## **1 What is this notice?**

This is the 'Recruitment Privacy Notice' of Scottish Friendly Assurance Society Limited. Our address is Scottish Friendly House, 16 Blythswood Square, Glasgow, G2 4HJ. Our telephone number is 0333 323 5433.

This notice applies to individuals applying to work with us, including prospective employees, workers and contractors.

We are a data 'controller', which means we are responsible for deciding how we hold and use your personal information.

This notice explains how and why we will collect and use your personal information in the context of the recruitment process and your rights in relation to your personal information. We may amend this notice at any time.

## **2 Data protection manager**

We have appointed a data protection manager. If you have any questions about this privacy notice or how we handle your personal information please contact the data protection manager. They can be contacted via the dedicated email address: [dataprotection@scottishfriendly.co.uk](mailto:dataprotection@scottishfriendly.co.uk) OR by writing to Data Protection Manager, Scottish Friendly Assurance Society Limited, Scottish Friendly House, 16 Blythswood Square, Glasgow, G2 4HJ.

## **3 Your personal information**

In this privacy notice, 'your personal information' means your personal data i.e. information about you from which you can be identified. Sections 6 and 7 below set out your personal information that we may process.

Your 'personal information' does not include data where the identity has been removed (anonymous data).

It is important that your personal information is accurate and up to date. Please inform us if your personal information changes during the recruitment process.

## **4 Special categories of personal information**

'Special categories of personal information' means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purpose of uniquely identifying you.

Data marked \* in the table at section 6 below falls within these 'special categories' or might disclose special categories of personal information. We must have additional legal grounds for processing special categories of personal information, and these grounds are set out at sections 6 and 6 below.

## 5 Where does your personal information come from?

Your personal information will come from you or us, and may also come from the following sources:

- Recruitment agencies may provide us with the following personal information: name, date of birth, address, CV, national insurance number, reference, form of ID, proof of right to work in UK (if applicable).
- Background check providers may provide us with the following personal information: address details including previous address/linked addresses, name(s)/aliases, date of birth, electoral roll details, credit account ID/address verifications, details of any CCJs or Court Decrees, Bankruptcy or other credit searches.
- Former employers or other referees, whom you have given us permission to contact, may provide us with the following personal information: name, dates of employment, job title, reason for leaving, any regulatory functions held.
- Medical professionals may provide us with personal information relating to your fitness to work.
- Scottish Friendly staff may provide us with: personal information about you if they are referring you for recruitment.
- Professional bodies that confirm membership / qualifications / training may provide us with the following personal information: qualifications, registrations, accreditation details and membership details
- As part of the recruitment process we may source personal information held on publicly available sources such as Google and social networking accounts e.g. LinkedIn. This would include information relating to roles you have held, details of skills and capabilities and any other information that helps us to assess your suitability for the position applied for.
- Disclosure Scotland: as described at section 7 below.

Some of the sources above will only be relevant in certain circumstances, or if you have applied for a particular role. If you would like more information on the source of your personal information please contact the Data Protection Manager.

## 6 Processing your personal information

We may process your personal information during and after the recruitment process. This may include collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

In general, we process your personal information for the reasons, and on the legal grounds set out in the following table, and also to:

- Retain records relating to the recruitment process;
- Establish, exercise or defend legal claims;
- Comply with the law or requirements of a regulator; and / or
- Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency).

<b>Reason for processing your personal information</b>	<b>Legal ground(s) for processing, and legitimate interest (where applicable)</b>	<b>Your personal information</b>
Contact you regarding the recruitment process and any offer of work	To enter a contract	Personal contact details (including name, address, email, telephone number)
Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work	To enter a contract To comply with a legal obligation For our legitimate interests: <ul style="list-style-type: none"> <li>• to select suitable employees, workers and contractors</li> </ul>	<ul style="list-style-type: none"> <li>• Your application form, CV, any covering letter or email, interview notes and information from publicly available sources such as Google and social networking sites.</li> </ul>
If you have accepted an offer of work from us that is subject to such checks: <ul style="list-style-type: none"> <li>• Take up references (from referees whom you have given us permission to contact);</li> <li>• Carry out background checks;</li> <li>• Confirm your professional</li> </ul>	To enter a contract To comply with a legal obligation For our legitimate interests: <ul style="list-style-type: none"> <li>• to select suitable employees, workers and contractors</li> </ul>	<ul style="list-style-type: none"> <li>• References and details of previous employers</li> <li>• Professional memberships, registrations and qualifications</li> <li>• Copy of your driving licence (for criminal records check as part of SIMF application).</li> <li>• Correspondence and results regarding background check and criminal records check (If carried out).</li> </ul>

memberships, registrations and / or qualifications.		
Determine the terms of any potential contract between you and us	To enter a contract To comply with a legal obligation	Offer letter, and proposed contract between you and us
If you have accepted an offer of work, check you are legally entitled to work in the UK	To enter a contract To comply with a legal obligation	Documentation confirming your right to work in the UK
If you have accepted an offer of work from us that is subject to such a check: assess your fitness to work via a health questionnaire or medical report	For our legitimate interests: <ul style="list-style-type: none"> <li>To select suitable employees, workers and contractors</li> </ul> <u>*For special categories of information:</u> <ul style="list-style-type: none"> <li>To exercise or perform employment law rights or obligations</li> <li>For the purposes of preventive or occupational medicine, or for the assessment of your working capacity</li> </ul>	
Carry out equal opportunities monitoring	For our legitimate interests: <ul style="list-style-type: none"> <li>To review equality of opportunity or treatment</li> </ul> <u>*For special categories of information:</u> <ul style="list-style-type: none"> <li>To review equality of opportunity or treatment</li> <li>To exercise or perform employment law rights or obligations</li> </ul>	The following information you have provided via our [equal opportunities monitoring form]: <ul style="list-style-type: none"> <li>Age and date of birth</li> <li>Gender</li> </ul>

## **7 Information about criminal convictions**

To enable us to make recruitment decisions and assess suitability for particular work, we will process information about criminal convictions and offences (including alleged offences) as described in this section 7.

We will process this information to enter a contract with you, to comply with a legal obligation, for our legitimate interests (in selecting suitable employees, workers and contractors), and to exercise or perform employment law rights or obligations.

If you have accepted an offer of work from us that is subject to a criminal record check i.e. a role which performs a SIMF function, we will carry out a basic disclosure check from Disclosure Scotland.

## **8 Data necessary for the contract**

Sections 6 and 7 identify personal information that we may need to enter a contract with you. If you don't provide this data, we may not be able to proceed with the recruitment process or enter into the contract.

## **9 Statutory requirement to provide your personal information**

In some circumstances, the provision of your personal information is a statutory requirement. This includes:

- Documentation confirming your right to work in the UK – if you don't provide this, we may not be able to enter into a contract with you.

## **10 Sharing your personal information with third parties**

We may share your personal information with the following third parties if this is required by law; necessary to enter a contract with you; where there is another legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person:

- Health professionals and occupational health providers involved in your care, for the purposes of establishing whether you can undergo an assessment which forms part of the application process; and/or considering reasonable adjustments to the recruitment process for disabled applicants; establishing whether you will be able to carry out a function that is intrinsic to the particular work; establishing whether you are eligible for our guaranteed interview scheme for disabled applicants; and / or assessing your fitness to work if you have accepted an offer of work from us that is subject to health checks.
- The Financial Conduct Authority and the Prudential Regulation Authority.
- Our professional advisors.
- Other third parties as necessary to comply with the law.

## 11 Data retention

If you don't start work with us following the recruitment process, we will retain your personal information for six months thereafter:

- to allow us to establish, exercise or defend legal claims; and
- for our legitimate interests – to enable us to reconsider your application and (if appropriate) contact you, if the position you applied for becomes available again.

If you start work with us following the recruitment process, we will give you a copy of our Worker Privacy Notice, and will retain your personal information as detailed in the Worker Privacy Notice.

## 12 Your rights

You have the following rights:

- **Access:** you can request a copy of your personal information that we hold, and check we are processing it lawfully.  
**Correction:** you can ask us to correct your personal information if you don't think it is accurate, complete or up-to-date.
- **Deletion:** you can ask us to delete your personal information, if:
  - it is no longer necessary for the purposes for which we obtained it;
  - you withdraw your consent, and we have no other legal basis for the processing;
  - you validly object to the processing as described below;
  - we have unlawfully processed the data; or
  - we must delete the data to comply with a legal obligation.
- **Objection:** if we process your personal information to perform tasks carried out in the public interest or on the basis of legitimate interests, you can object to this processing on the basis of your particular situation. We will only then continue the processing if we have overriding legitimate grounds for this, or the processing is to establish, exercise or defend legal claims. You may also object if we process your personal information for direct marketing purposes.
- **Restriction:** you can ask us to restrict our processing of your personal information if:
  - you contest the accuracy of the data (for a period that enables us to check it);
  - our processing is unlawful, but you don't want the data deleted;

- we no longer need the data, but you require it to establish, exercise or defend legal claims; or
- you have objected (as above) and are awaiting confirmation as to whether we have overriding legitimate grounds for processing.
- **Transfer:** if our processing is based on your consent or necessary to carry out our contract with you, and is carried out by automated means, you can request a copy of the personal information you have provided to us and the transfer of this to someone else. Where technically feasible, you can ask us to transfer it directly.
- **Complain to the Information Commissioner:** the Information Commissioner is the UK supervisory authority for data protection issues. We aim to resolve all complaints internally via our data protection manager who can be contacted as described at the email address of contact address above, but you do have the right to complain to the Information Commissioner at any time.

Please contact our data protection manager if you require more information on these rights, or wish to exercise any of them.