

## **BESA Group Data Privacy Notice**

**Organisation:** The BESA Group  
**Service:** HR – Recruitment Processes

This privacy register tells you about the personal data we collect and the associated processing activities relevant to delivering this service.

### **Our role in processing your data**

Data Controller – we have overall responsibility for your personal data.

### **About the personal data we hold**

The main categories of personal data we hold about you are as follows:

- Title, Name
- Contact Details – Home Address, Telephone Number(s), Email Address
- Education & Work History
- Acceptable documents to establish right to work

### **Sensitive Personal Data**

The special categories of sensitive personal data that we hold about you are as follows:

- We do not routinely capture any special categories of data.

### **Why we are capturing your data**

We capture your data so we can undertake the following processing activity:

- Review the information against the required role/person criteria
- Determine an interview short-list
- Interview short-listed candidates
- Provide effective communication throughout the process
- Legislative requirement to establish right to work

### **Automated decision making and profiling**

There isn't any automated decision making

A Personality Profile Analysis may be required (dependent on the role) – separate consent would be sought in this situation.

### **Our legal basis for processing your data**

We need a clear legal basis for capturing and processing your data. For this service this is:

- Consent - you may request and consent to specific services or processing activity
- Contract – Although contract not yet in place, this is a first step that may lead to a contract
- Legal Obligation – we are required to undertake some of our processing tasks by law.

### **Other legitimate interests**

There is a legitimate interest in sharing your data within the BESA Group for the purposes of:

- Recruitment Activities – Shared with those responsible for shortlisting and interviewing; and  
Where another opportunity arises that may match the skillset
- Utilising IT systems for processing activity.

### **Who we share your data with**

For the purposes specified above, your data will be shared with the following types of organisation.

- The Board(s) or Officers of the Association (Senior level recruitment, where involved in the interview process)

### **Sending your data outside the EU / EEA**

Personal data is not transferred to a third-party outside of the European Union or European Economic Area, unless part of a specific transfer request that you consent to.

### **Our criteria for retaining your data**

The personal data will be retained for the necessary time required to deliver this service and in line with relevant legislation for data retention.

### **Consequences of not giving us your data**

By not providing the required information, we may not be able to deliver the required service.

### **Your rights**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access  
You have the right to request a copy of the information that we hold about you.
- Right of rectification  
You have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten  
In some circumstances you can ask for the data we hold about you to be erased from our records.

- Right to restrict processing  
Where certain conditions apply to have a right to restrict the processing.
- Right of portability  
You have the right to have the data we hold about you transferred to another organisation.
- Right to object  
You have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling  
You also have the right to object to the legal effects of automated processing or profiling.

**Your consent**

By consenting to this privacy notice you are giving us permission to process your personal data for the purposes identified. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time.

**If you have a complaint**

Should you wish to complain about how your data is being handled, in the first instance please contact the Data Protection Officer specified below. If your complaint is not handled to your satisfaction, you also have the right to raise your concerns with the relevant supervisory authority.

**Details of the data controller**

Data Protection Officer  
BESA Group  
Old Mansion House  
Eamont Bridge  
Penrith  
CA10 2BX

**The supervisory authority for data protection**

Supervisory Authority: Information Commissioner's Officer (ICO)  
Website: <http://ico.org.uk>  
Telephone: 0303 1231113