

## Employment Candidate Privacy Notice

VLE Limited (together referred to as “VLE”, “us” or “we”) respect your privacy and are committed to protecting your personal data. VLE is a personal data controller. This means that we are responsible for deciding how we hold and use personal data about you. This notice is aimed at informing you of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (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.
- Maintained only for as long as necessary for the purposes we have told you about, i.e. in relation to the recruitment exercise.
- Kept securely and protected against unauthorised or unlawful processing and against loss or destruction using appropriate technical and organisational measures.

### **THE KIND OF DATA WE HOLD ABOUT YOU**

In connection with your application, we will collect, use and store the following categories of personal data about you:

- The data you have provided to us in your curriculum vitae (CV) and the personal data contained in your covering letter.
- The data you have provided on our application form, including name, title, home/term address, telephone number, personal email address, date of birth, gender, employment history, qualifications, nationality, social media accounts, profession, professional memberships, educational achievements, diplomas, transcripts, languages, computer skills, national service completion (if applicable), identification number and any data you provide us during interviews at our premises.
- Any personal data provided to us about you by your referees [if applicable].

### **HOW IS YOUR PERSONAL DATA COLLECTED?**

We collect personal data about candidates from the following sources:

- You, the candidate.
- Your named referees, from whom we collect the following categories of data: full name, periods of previous employment, performance during previous employment.
- From publicly accessible sources, such as LinkedIn, etc., where we collect your full name, email, work history, and other data included on your profile.

### **HOW WE WILL USE DATA ABOUT YOU**

We will use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the 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 the role since it would be beneficial to our business to appoint a suitable candidate to that role.

We also need to process your personal data to decide whether to enter into a contract with you.

Having received your CV and covering letter and the results from any tests you took, we will then process that data to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is suitable to invite you for an interview. If we decide to call you for an interview, we will use the data you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we may then take up references and/or any other check before confirming your appointment.

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

If you fail to provide personal data when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application further. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### **HOW WE USE PARTICULARLY SENSITIVE PERSONAL DATA**

We will use your sensitive personal data only in so far as we are permitted by law to do so:

- We will use data 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 a test or interview.

- We will use data about your nationality or ethnicity, to assess whether a work permit and a visa will be necessary for the role.

### **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 SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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**

We will retain your personal data for a period of 6 months. We retain your personal data 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. We further retain such personal data in case a similar role becomes vacant for which you will be a fitting candidate. After this period, we will securely destroy your personal data in accordance with our data retention policy.

### **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

#### **Your rights in connection with personal data**

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 data corrected.
- **Request erasure** of your personal data. 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 data. 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.

If you wish to request erasure of your personal data or object to the processing of your personal data, please send an email to [headofprivacy@virginlimitededition.com](mailto:headofprivacy@virginlimitededition.com).

#### **ADDRESS DATA PROTECTION QUERIES**

We have appointed a Head of Privacy to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the Head of Privacy at [headofprivacy@virginlimitededition.com](mailto:headofprivacy@virginlimitededition.com).