

JOB APPLICATION/RECRUITMENT PRIVACY NOTICE

INTRODUCTION

This Privacy Notice explains how your personal data is handled by the CareChoice Group where:

- You participate in a CareChoice recruitment initiative;
- You voluntarily submit an employment application/CV to the CareChoice Group on a speculative basis;
- You register onto the CareChoice online recruitment system;
- You apply for a speculative or advertised role within the CareChoice Group;
- An external recruiter provides your personal data to the CareChoice Group for employment consideration purposes. (Such external recruiters are Controllers of your personal data independent of the CareChoice Group).

CareChoice is the data controller in respect of the information that we process about you for recruitment purposes. Our contact details are CareChoice Group, Block 10-2 Blanchardstown Corporate Park 1, Blanchardstown, Dublin 15 A25K. Telephone 01 2233000.

Your privacy is important to us, so if there is anything in this privacy notice that is unclear or you do not understand, please contact the Data Protection Officer at dpo@carechoice.ie

APPLICATION OF THIS NOTICE

This Privacy Notice applies to the processing of your personal data from the time the data is provided to the CareChoice Group by you or an external recruiter on your behalf for employment consideration purposes. For successful candidates who commence employment with the CareChoice Group, the way we process your Personal Data will no longer be dealt with under this notice but will instead be managed in accordance with the CareChoice Staff Privacy Notice.

DATA PROTECTION PRINCIPLES

Under the General Data Protection Regulations (GDPR) all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that

- processing is fair, lawful and transparent
- data is collected for specific, explicit, and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisational measures

DATA WE COLLECT ABOUT YOU

To manage our operations effectively, to enable us to consider whether to enter into a contract with you and to meet certain legal requirements, CareChoice will collect, store, and use categories of personal information about you. The data you provide may include a variety of information, such as your name, contact information, work history, curriculum vitae, education details, qualifications, referee names, and a photograph.

Further data may include shortlisting notes, interview notes, score sheets, date of birth, PPS number, visa documentation if relevant, professional registration details and health information including fitness to work confirmation and health issues requiring adaptations to the working environment.

For all roles we seek information about past criminal convictions, working with children or vulnerable adults, and/or your fitness to practise in certain regulated professions.

OUR LAWFUL BASIS FOR USES OF YOUR DATA

Under data protection laws we must have a legitimate and lawful basis for processing your personal data. We primarily process your personal data for us to consider whether to enter into a contact with you and to enable us to

comply with legal obligations e.g. employment legislation, care and welfare regulations, health and safety requirements, garda vetting legislation etc.

Where we process your data to perform our contract obligations the legal basis is:

Article 6(1)(b) of the GDPR – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Where we have a specific legal obligation that requires the processing of personal data, the legal basis is:

Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

Where relevant we may process your personal information to look after your vital interests in the event of an emergency. In this case the legal basis is:

Article 6(1)(d) – processing is necessary in order to protect the vital interests of the data subject or of another natural person.

It may be necessary to process your personal data for us to establish, investigate, exercise or defend a legal claim. The legal basis here is:

Article 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

When we process your personal data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

Where we process special categories data for employment purposes the condition is:

Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law

PURPOSE – HOW WE USE YOUR INFORMATION

We process your personal data to:

- process your job application including to contact you in relation to interviews and/or offer you a job after the interview stage;
- assess your skills, qualifications and aptitude against vacancies in the CareChoice Group which may be suitable for you;
- request information from third parties (such as references from previous employers);
- to contact you about future vacancies/roles with the CareChoice Group which we think you may be interested in;

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

WHO WE SHARE YOUR DATA WITH?

Your personal information may be shared with the following parties:

- Those employees who would have managerial responsibility for you or are acting on their behalf
- Employees in HR who have responsibility for certain HR processes (for example recruitment, assessment, pre-employment screening)
- Employees who are part of the selection and / or interview panel
- Employees in the Senior Management Team or HR with responsibility for policies and contractual requirements.
- Your previous employer(s) (where you have listed them as your reference(s));
- External recruiters (where your application is being handled by an external recruiter);
- Outsourced service providers who assist CareChoice with recruitment initiatives and campaigns;

- Third Party service providers such as those who support the CareChoice's electronic recruitment system;
- Professional advisors such as legal advisors.

WILL YOU BE SUBJECT TO PROFILING?

We may use profiling (e.g. psychometric testing) as part of the recruitment process. When this is necessary, CareChoice will take steps to ensure that the data will only be transmitted to qualified companies

KEEPING YOUR INFORMATION UP TO DATE

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

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 limit access to your personal data to those employees, contractors and other third parties on a need-to-know basis, i.e. who need the access in order to fulfil the tasks and duties relating to service provision. All service providers are permitted to process your personal data based on our instructions, they are subject to a duty of confidentiality, and they are required to be compliant and demonstrate compliance with Personal Data Protection.

Our IT systems are protected against unauthorised access with various level of controlled and password protected access rights.

Where personal records are kept in paper format these are stored securely with controlled access.

We have implemented procedures to deal with any actual or suspected data security breach and will notify you and any applicable authority about a breach where we are legally required to do so.

RETENTION OF YOUR DATA

Successful applicant data resulting in subsequent employment will be retained for 7 years following cessation of employment.

Where you are an unsuccessful job applicant, we will retain your personal data for 12 months from the most recent of the following occurrences:

- You register online as a candidate or an external recruiter registers your details with us;
- Either you or an external recruiter on your behalf submit or withdraw an application;
- We advise you or an external recruiter on your behalf that your application has been unsuccessful;
- You decline our offer of employment.

In certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your personal data.

YOUR RIGHTS

Under certain circumstances, you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are collecting and using it lawfully.
- Request correction of the personal information 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 information where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground.
- Request the restriction of collecting and using your personal information. This enables you to ask us to suspend the usage of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the data portability of your personal information to another party.
- Right to lodge a complaint to supervisory authority.

- Right to withdraw consent. In circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

You may exercise any of the above rights by emailing the Data Protection Officer at dpo@carechoice.ie or by post to CareChoice Group, Block 10-2 Blanchardstown Corporate Park 1, Blanchardstown, Dublin 15 A25K.

CHANGES TO THIS PRIVACY NOTICE

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. This Privacy Notice was updated on December 16th, 2019.

QUESTIONS ABOUT THIS NOTICE

If there is anything in this notice that you are unclear about, please contact our Data Protection Officer at dpo@carechoice.ie or by post to CareChoice Group, Block 10-2 Blanchardstown Corporate Park 1, Blanchardstown, Dublin 15 A25K.

The Data Protection Officer will answer any queries you may have concerning this privacy notice or the way in which we process your personal data.