

Privacy Notice for Applicants

1. Background

ITM is committed to protecting the privacy and security of personal information that we hold about you.

Under data protection laws, we are the “data controller” in relation to your personal information. This means that we are responsible for deciding what information to collect about you and how it is used. We are required under data protection legislation to notify you of the information contained in this privacy notice.

2. What is the purpose of this document?

This privacy notice describes the personal information that ITM collects about you, how and why we use it, who we disclose it to and how we keep it safe.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

3. Basis for Processing your Data as an Applicant

If you apply for a role or work experience opportunity, or a recruitment event at ITM or any of its Group Companies, you may need to provide personal information including special categories of personal information. Your application directly to us, or via a recruitment agency, will constitute your express consent to our use of this information. We will use this information to consider your application for a position with ITM or any of its Group Companies (with the exception of any information collected for diversity monitoring which will be anonymised and used for statistical purposes and to help us meet our regulatory and legal requirements only). We may also use the information to carry out checks to verify the information provided by you (including reference, background, identity, suitability and criminal record checks).

We use a third-party service provider (Volta Data Centre, London, UK) to store this information and we also share some information with other third parties to help us contextualise the information, where relevant. We may disclose it to recruiters, screening check providers (Complete Background Screening (CBS) & CIFAS fraud protection Service, London UK), providers of occupational personality tests, professional associations, government and law enforcement agencies, referees and your current and previous employers.

4. What personal information do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.

We collect, store, and use any or all of the following categories of personal information about you in connection with your application or interest with the company:

- Basic information such as name, title, home address, telephone numbers, personal email addresses, date of birth and gender
- Recruitment information (including copies of right to work documentation, passport information, references and other information included in a CV or cover letter or as part of the application process).
- Information about your current level of remuneration, including benefit entitlements.
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK.
- CCTV footage and other information obtained through electronic means such as swipe card records.
- Photographs

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

We may also collect, store and use any or all of the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.
- Information about criminal convictions and offences.

We may 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 online tests.

5. Data security

We have put in place measures to protect the security of your information. ITM have an established information security management framework which is audited and complemented by the achievement of ISO 27001 and Cyber Essentials Plus certifications. Several technical and physical controls have been implemented and are maintained to ensure the ongoing confidentiality, integrity and availability of all data stored and processed and resilience of processing systems and services.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from our Data Protection policies on Confluence.

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.

6. Why do we process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

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

We may process special categories of data, such as information about ethnic origin, gender, sexual orientation or religion or belief, to monitor recruitment statistics and for the purposes of equal opportunities and diversity monitoring. Data that we use for these purposes is anonymised or is collected with the express consent of applicants, which can be withdrawn at any time. Applicants are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out our obligations and exercise specific rights in relation to employment.

For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

We will not use your data for any purpose other than the recruitment exercise for which you have applied

7. Who has access to your data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy, IT staff and internal and external auditors, if access to the data is necessary for the performance of their role.

We will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers, with your consent, to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

We may also be legally required to provide your information to law enforcement agencies and regulators who have legal rights of access to your information.

We will not transfer your data outside the UK or European Economic Area.

8. How long will we keep your personal data?

We will retain your personal information only for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will retain a record of your application to ITM or any of its group Companies for a period of twelve months. Please refer to clause 9 if you wish to exercise your right to be forgotten under GDPR

9. What are your rights over your personal data?

Under certain circumstances, by law you have the right to request:

- ▶ **Access to the personal information we hold about you**
This is commonly known as a “data subject access request” and is free of charge in most cases. It enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- ▶ **Correction of your personal information when incorrect, out of date or incomplete.**
This enables you to have any incomplete or inaccurate information we hold about you corrected.
- ▶ **Deletion of your personal information from our records and systems**
This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.

- ▶ **Restriction of processing of your personal information**
This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. When processing is restricted, we can continue to store the personal information.
- ▶ **That we stop any consent-based processing of your personal data after you withdraw that consent**
- ▶ **An electronic file of your personal information or have it transferred to another data controller.**

If you want to exercise any of these rights, please contact our Data Protection Officer at using the contact details below. We will respond to any request received from you within one month from the day we receive the requests.

If we choose not to action your requests we will explain to you the reasons for our refusal.

10. Your duty to inform us of changes

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

11. Right to withdraw consent

In the limited circumstances where you may 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. To withdraw your consent, please contact HR. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12. Data protection officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. The DPO is currently Eamonn Pugh.

If you have any questions about this privacy notice or how we handle your personal information, you can contact the DPO by any of the following means:

Email: DPO@itm.co.uk

Phone: 020 7648 9990

Post: ITM, Tempus Court, Onslow Street, Guildford, GU1 4SS

13. Making a complaint

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

The ICO can be contacted by any of the following means:

Email: Via the email form on the ICO's website

<https://ico.org.uk/global/contact-us/email>)

Phone: 0303 123 1113

Post: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

14. Contacting us

If you have any questions about how we use your personal information, please contact either Hilary Chapman in her capacity as Head of Business Management or Eamonn Pugh in his capacity as Data Protection Officer.

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16.11.2018	1.0	Public	Hilary Chapman	Creation of document
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