

Privacy Policy Recruitment

This privacy notice explains what personal data is collected about employment and contractor candidates during the recruitment process and how we will use it. We are committed to protecting your privacy and meeting our legal obligations when you apply for a job or you (or an agent acting on your behalf) share your employment details with us.

'The company' is committed to protecting your personal data. We use a variety of technical and organisational measures to help secure your personal data from unauthorised access, use or disclosure.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the 'Last Updated' date at the top of this page. Please review this privacy notice periodically to check for updates.

Scope

For the avoidance of any doubt, any reference to the 'Company' in this policy applies to any Company within the Vital Holdings Group.

This policy will apply to personal data we collect about you during the recruitment process for the Vital Holdings Group.

The IT Department, in conjunction with the HR Department, is responsible for the implementation, resourcing, training and administration of this policy.

Responsibilities

All directors, employees, ex-employees, contractors, agency workers, sub-contractors and visitors of the 'Company' are responsible for complying with this policy.

Data Protection Principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

Personal data we collect

When you apply for a role (whether as an employee or a contractor) or submit your CV (or similar employment information) to us, whether directly or through an agency, or are interviewed by us we will collect your personal data. This may include:

- Your personal details including name and contact details, date and place of birth, gender, marital status
- Work history and employment positions held
- Salary, other compensation and benefits information
- Nationality / visa / right to work permit information
- Academic and professional qualifications, education and skills
- Photographs or videos you submit with your application
- Demographic information
- Any other information you choose to give us
- Records we create during interviews or correspondence with you
- Results of pre-employment screening checks

We may also collect some sensitive personal data about you, such as disability information. We will only do this to make reasonable adjustments to enable candidates to apply for jobs with us, attend interviews and to start work with us if successful. Also, to ensure we meet our legal obligations when recruiting.

Special categories of data

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership and
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal Conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data in the following ways:

- DBS Checks
- Contractual/Bid tendering obligations e.g. if the bid is for work at HM prisons
- Driving convictions for insurance renewals and DVLA compliance
- In line with FSA regulations

Automated decision making

We will make some decisions about you based on automated decision making (where a decision is taken about you using an electronic system without human involvement). This is specifically related to any malicious IT activity on your account, whereby as a precautionary measure your access to our system(s) may be temporarily blocked.

How we use your personal data

We use the personal data you share with us in a variety of ways, including to:

- Process your application (including by adding you to our HR and people management system)
- Communicate with you, including by telephone, email and SMS
- Assess your suitability, skills and experience for the role you have applied for
- Set up and conduct interviews by telephone and in person
- Contact third party references you have provided us
- Conduct pre-employment screening checks

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with (as appropriate), your application.

Basis for using your personal data

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the employment contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

We need to collect your data to ensure we are complying with legal requirements such as:

- carrying out checks in relation to your right to work in the UK and
- making reasonable adjustments for disabled employees.

We also collect data so that we can carry out activities which are in the legitimate interests of the Company. We have set these out below:

- making decisions about who to offer employment to
- making decisions about salary and other benefits
- assessing training needs
- dealing with legal claims made against us

When processing your personal data for the purposes of administering your job application, assessing your candidacy for a role, communicating with you and contacting third party references we do so with your consent. By submitting your application, you are confirming your consent to us processing your personal data for these purposes. You can withdraw your consent at any time, by contacting us at dataprotection@vitalenergi.co.uk or by writing to us at the address below.

If we process any sensitive personal data, including information we collect from pre-employment screening checks, we will do so only with your explicit consent and will ask for your explicit consent in these circumstances (unless we are required by law to collect this information).

If your job application is unsuccessful, and unless you ask us not to, your details will be added to our talent pool and we may make contact with you again (including by telephone or email). This is because it is in our legitimate interests to maintain the details of, and stay in contact with, suitable candidates for future roles. You can object to being in our talent pool at any time, by contacting us at dataprotection@vitalenergi.co.uk or by writing to us at the address below.

Less commonly, we may process your personal data in relation to legal claims.

Sharing your data

We may share your data with our affiliate companies for the purposes of centralised processing and because you may be suitable for a role with one of our affiliates.

We may also share your data with service providers and suppliers to our business who process data on our behalf. This includes, for example, cloud service providers (e.g our HR and people management system, which is cloud service provided to us by a third party). In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the contract we enter into with them.

Within Vital Energi, your personal data will only be shared with those who need to have access to it. This will primarily be our HR personnel and hiring managers.

It is possible that we may be required to share your data to comply with applicable laws or with valid legal processes, such as in response to a court order or with government or law enforcement agencies.

How long we keep your data

We will retain your personal data for only as long as is necessary for the recruitment process. If your candidacy is successful and you are employed by us, your data will be processed and retained as set out in our employee privacy notice, provided to you with your employment paperwork.

If your candidacy is not successful, we will retain your CV, application details and interview notes for 12 months (from the date of first receipt of your details). During this time, we may add your information to our talent pool unless you ask us not to or subsequently object to us doing so.

We will also retain personal data where it is necessary to comply with our legal obligations or as necessary in relation to legal claims. This is rare but may mean we need to retain your data for longer than 12 months.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

Your Rights

Individuals whose personal data we hold, and process have the following rights:

- Right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- You have the right of access to your personal data and can request copies of it and information about our processing of it.

- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where it is no longer necessary for us to retain it for the purposes for which it was collected or where there is no lawful reason for us continuing to process it.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- In some circumstances, you can restrict our processing of your data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data
- The right to portability. You may transfer the data that we hold on you for your own purposes
- The right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- The right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

If you wish to exercise your rights, please contact us at dataprotection@vitalenergi.co.uk or write to us at the address provided below.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided [at this link](#).

Who to contact

You can contact Vital Energi in relation to data protection and this privacy notice by writing to:

**Group IT Manager
Vital Energi
Century House,
Roman Road,
Blackburn**

BB1 2LD
United Kingdom

Alternatively, you can email us at dataprotection@vitalenergi.co.uk

Changes to this privacy notice

Vital Energi 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. We may also notify you in other ways from time to time about the processing of your personal information.