

Introduction

In accordance with the General Data Protection Regulation (GDPR), Cyrrus has implemented this privacy policy to inform you, as a prospective employee of our Company, of the types of “applicant personal data” we process about you during the recruitment process. We also include within this policy the reasons for processing your personal data, the lawful basis that permits us to process it, how long we keep your personal data for and your rights regarding your personal data.

Data Protection Principles

Under GDPR, all 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 organisation measures;
- We comply with the relevant GDPR procedures for international transfer of personal data.

Data Collected

We keep several categories of personal data on our prospective employees in order to carry out effective and efficient recruitment processes. We keep this data in recruitment files relating to each vacancy and we also hold the data within our computer systems.

Specifically, we hold the following types of data:

- Personal details such as name, address, phone numbers;
- Proof of ID, for example a copy of your passport;
- Your gender, civil status, information of any disability you have or other medical information (if relevant and appropriate to do so);
- Right to work documentation;
- Information gathered via the recruitment process such as that entered into a CV or application form or included in a covering letter;
- References from former employers;
- Details on your education and employment history etc.;
- Driving licence (where applicable).
- Criminal convictions.

Collecting Your Personal Data

You provide several pieces of personal data to us directly during the recruitment exercise.

In some cases, we will collect data about you from third parties, such as employment agencies and former employers when gathering references.

Should you be successful in your job application, we will gather further information from you. For example, once your employment begins we would seek bank and next of kin details. The Cyrrus HR Privacy Policy documents our policy for collecting and holding employee personal data.

Lawful Basis for Processing

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

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity Requiring Your Data	Lawful Basis
Carrying out checks in relation to your right to work in the UK	Legal Obligation
Making reasonable adjustments for disabled employees	Legal Obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Making decisions about contractual benefits to provide to you	Our legitimate interests
Assessing training needs	Our legitimate interests
Preventing fraud	Our legitimate interests

Cyrrus may be required to carry out processing activities using special category data:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments

Most commonly, Cyrrus 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.

Special categories of personal data are relating to your:

- Health;
- Sex life;
- Sexual orientation;
- Race;
- Ethnic origin;
- Political opinion;
- Religion;
- Trade union membership;
- Genetic and biometric data.

Failure to Provide Personal Data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment or administer contractual benefits.

Criminal Conviction Personal 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, it may also be collected during your employment.

Who We Share Your Personal Data With

Employees within our Company who have responsibility for recruitment will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

We do not share your data with third parties (unless it is to comply with legal obligations) nor with bodies outside of the European Economic Area.

Protecting Your Data

Cyrrus is aware of the requirement to ensure your personal data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to safeguard against such occurrences.

Retention Periods

We only keep your personal data for as long as we need it. In relation to unsuccessful candidates, this is typically six months and no longer than a year.

If your application is not successful and we have not sought consent, or you have not provided consent upon our request to keep your personal data for the purpose of future suitable job vacancies, we will keep your personal data for six months once the recruitment exercise ends.

Your Rights in Respect of Your Personal Data

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for twelve months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

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

If you wish to exercise any of the rights explained above, please contact us via the following webpage www.cyrrus.co.uk or email vacancies@cyrrus.co.uk.

Complaints

If you have any complaints about our use of your data, please contact us. You also have the right to complain to the relevant supervisory authority in your jurisdiction. In the UK, the supervisory authority is the Information Commissioner's Office (ICO). Contact details for the ICO can be found at <https://ico.org.uk/>.

If you have any further queries or comments on our Privacy Policy for Job Applications, please contact us via the following webpage www.cyrrus.co.uk or email vacancies@cyrrus.co.uk. We also welcome your views about our website and our Privacy Notice.

ORIGINAL SIGNED

Signed:

Rob Cooke (Managing Director)

Date: 21 February 2023

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