

## Job Applicant Privacy Notice

**Data Controller: Onebright Limited, First Floor West Wing, Holgate Park Drive, York, United Kingdom, YO26 4GN**

This privacy notice explains what personal data Onebright collects and processes from job applicants and other subdomains owned and run by the Onebright Group. The "Onebright Group" includes Onebright Bidco Limited (company number 11791999), Onebright Limited (company number 09507950), Onebright Efficacy Limited (company number 06245547), Moving Minds Psychological Management and Rehabilitation Limited (company number 4353657), Onebright Training Limited (company number 7037705), Expert Psychological Reports Limited (company number 8073738) and Onebright Psychiatric Services Limited (company number 14014785); all with registered offices at First Floor, West Wing, Holgate Park Drive, York, United Kingdom, YO26 4GN. References to the "organisation" in this privacy notice means one or more of the Onebright Group. It also describes how we use that data and explains your rights concerning your personal data and how to contact us or a relevant regulator if you have a complaint about how we process and use the personal data we collect about you.

Where we collect, use and are responsible for certain personal data about you, we are subject to the UK General Data Protection Regulation ("**UK GDPR**"). We are also subject to the EU General Data Protection Regulation ("**EU GDPR**") in relation to Services we offer to individuals in the European Economic Area ("**EEA**"). We may also be subject to other data protection laws where we offer Services to individuals based outside of the UK and the EEA or if we provide Services from outside of the UK or the EEA.

This privacy notice is divided into the following sections:

- Information we collect about you
- How and why we use your personal information
- Who we share your personal information with
- Data security and protection
- Retention of your personal information
- Your privacy rights
- What if you do not provide personal information?
- Automated Decision Making
- How to complain
- Changes to this privacy notice

### Information we collect

In connection with your application for work with us, the organisation collects a range of information about you. This includes:



- your name, title, address, gender, date of birth and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your entitlement to work in the UK and equal opportunities monitoring information, including information about your ethnic origin, sexual orientation and health.

Onebright Limited may collect this information in a variety of ways. For example, data might be collected through 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.

The organisation may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks.

The organisation will seek information from third parties only once a conditional job offer to you has been made and will inform you that it is doing so.

Data will be stored in Oleeo. We use the Oleeo platform to manage your application. Oleeo may monitor your use of this website and record your email address for our internal purposes. For further information please refer to [Oleeo's Privacy Notice](#).

### **How and why we use your personal information**

The organisation will ask for your consent (pursuant to GDPR, Article 6(1) (a) and Article 9(2) (b) to process personal data during the recruitment process and keep records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, carry out background and reference checks (as applicable), assess and confirm a candidate's suitability for employment and decide to whom to offer a job, communicate with candidates about the recruitment process, and keep records relating to our hiring processes. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations (Article 6 (1) (b)) . For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The organisation may process special categories of data, such as information about ethnic origin and sexual orientation, to monitor recruitment and equal opportunity statistics and



report on the same.

The organisation is entitled to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment, and/or to satisfy itself that there is nothing in your criminal convictions history which makes you unsuitable for the relevant role.

If your application is unsuccessful, the organisation will keep your personal data on file in case there are future employment opportunities for which you may be suited. You are free to withdraw your consent at any time.

To withdraw your consent, please use contact [careers@onebright.com](mailto:careers@onebright.com) . Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### **Who we share your personal information with**

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

The organisation will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers 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.

The organisation will not transfer your data outside the European Economic Area.

### **Data security and protection**

The organisation takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

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.



## Retention of your personal information

If your application for employment is unsuccessful, the organisation will hold your data on file for 24 months after the end of the relevant recruitment process (unless you apply for another role with us, in which case we will hold your data on file for 24 months after your final application).

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## Your privacy rights

If you are in the EEA or the United Kingdom you have certain privacy rights and protections under the EU GDPR or the UK GDPR. These are the following:

- Rectify inaccurate or outdated information
- Request to move your data (data portability)
- Object to data processing
- Withdraw your data consent at any time
- Be forgotten
- Ask for a copy of your data via a Subject Access Request (SAR)
- Lodge a complaint with the UK's Information Commissioner's Office (ICO) or other relevant supervisory authority

If you think that there are any inaccuracies in your data then let us know and we will amend your records. We also provide reasonable access to our visitors for reviewing the data that you have provided to this website. In this instance please contact [careers@onebright.com](mailto:careers@onebright.com) with your request.

If you'd like to remove the data that you have supplied to us then you can do so by here and we'll delete your records for you.

For further information on each of those rights and who to contact in regards to the contents in this privacy notice, please refer to our full privacy policy on our website; [www.onebright.com](http://www.onebright.com)

## What if you do not provide personal data?

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

## Automated decision-making

Recruitment processes are not based solely on automated decision-making.



## How to complain

Please contact us if you have any queries or concerns about our use of your personal information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK, and
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA

The UK's Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time.

Date: 07/02/2024