

## **PRIVACY NOTICE**

### **What is the purpose of this document?**

The Midcounties Co-operative Limited (referred to as "the Society", "we", "us") is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being provided with this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### **Data protection principles**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **The kind of information we hold about you**

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and any covering letter.
- The information you have provided on our application form or when subscribing for job alerts, including name, title, address, telephone number, personal email address, date of birth, nationality, gender, employment history, qualifications, driving licence status.
- Any information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition or disability, health and sickness records.
- Information about criminal convictions and offences.

### **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies and websites, from which we collect data included on your CV such as your name, title, address, telephone number, personal email address, date of birth, nationality, gender, employment history, qualifications, driving licence status.
- Credit reference agencies, from which we collect data relating to your credit worthiness.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we collect data relating to your character and career history.
- From publicly accessible source such as social media sites.

### **How we will use information about you**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Send you job alerts by email, where requested.

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV, any covering letter, your application form and the results from any tests taken, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and, if appropriate, carry out criminal record and any other checks before confirming your appointment.

### **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### **How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. If you want to know more about the Society's commitment to equality, please click here: <https://www.midcounties.coop/our-values/equality/>.

### **Information about criminal convictions**

For certain roles with the Society, we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check

in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required to carry out criminal record checks for certain roles such as pharmacists within our Healthcare business, those wishing to work in our Childcare nurseries and those applying for a personal licence in relation to our licensed premises.
- Certain roles within our Healthcare and Childcare businesses, which involve the safeguarding of children and vulnerable adults, are eligible for enhanced checks with the Disclosure and Barring Service and are also listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023).
- For certain other roles, such as within our Post Offices (handling significant sums of money) and Coop Energy (where access to customers SMART meter records is involved) require a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data sharing**

#### **Why might you share my personal information with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application: search consultancies, background check providers and other entities within the Society's Group. All our third-party service providers and other entities in the Group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Data security**

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 particular, we use an industry recognised, cloud-based online recruitment platform provided by Eploy (registered as ITS Software Systems Ltd). Eploy store your personal data on a dedicated hosting platform which complies with

SAS70 and ISO27001 standards for optimum security. 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.

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.

## **Data retention**

### **How long will you use my information for?**

We will retain your personal information for at least three months but no longer than 12 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## **Your privacy rights**

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **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 process 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 (see below).
- **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 particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the 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.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Society's Data Protection Manager in writing.

You can find more information about your privacy rights on the Information Commissioner's Office website: <https://ico.org.uk/for-the-public/>.

### **Contacting us**

We have appointed a data protection manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the **Society's Data Protection Manager** at [data-protection@midcounties.coop](mailto:data-protection@midcounties.coop), or by writing to: Data Protection Manager, The Midcounties Co-operative, Co-operative House, Secretariat Group, Warwick Technology Park, Warwick CV34 6DA.

If you need further information about the Society's recruitment process, please contact our **Head Office's HR department** at The Midcounties Co-operative, Co-operative House, Personnel Services Group, Warwick Technology Park, Warwick CV34 6DA or telephone 01926 516 000.

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: <https://ico.org.uk/for-the-public/raising-concerns/>