

Recruitment Privacy Notice

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1. Introduction

As part of our recruitment processes, Segen Ltd (“Segen”, “we”, “us”, “our”) collects, stores, and processes personal data about job applicants and prospective candidates (“you”, “your”). We are committed to protecting your privacy and personal data, and are therefore transparent regarding the data we collect, how the data are collected, where the data are stored, and how the data are processed. The following notice details all of the above, setting out our obligations under both the *General Data Protection Regulations 2016/679* (“GDPR”) and the *Data Protection Act 2018* (“DPA”).

2. The data we collect

a. Information We Collect from You

- Basic personal details including but not limited to your name, email address, contact number(s), postal address, and preferred method of contact.
- Availability and work eligibility details including but not limited to your notice period, preferred start date, current and/or future work eligibility status, visa type, and visa expiry date.
- Documents you provide throughout the application process including but not limited to CVs, covering letters, and assessment outputs. These documents may contain information on your employment history, academic qualifications/history, professional training/certifications, skills, and experiences.
- Application details including but not limited to the source of your application, the date/time, the role(s) you applied for, salary history/expectations, and Equal Opportunities statements.
- Records of electronic communications, including but not limited to the content and attachments of emails.

b. Information We Collect/Generate About You

- Publicly available data including but not limited to your professional social networks (primarily LinkedIn, but also GitHub, Facebook, Instagram and similar networks.).
- Job application progress including but not limited to the stages you complete of the recruitment process, records of interviews, interview notes/feedback, assessment feedback, rejection stage, rejection reason, and job offer details.

3. How the data records are collected

Personal data may come from a combination of any of the following sources:

- Information you provide on application forms, in email and telephone conversations with our representatives, and in job interviews and assessments.
- Information we collect from publicly available sources online.
- Information we generate following your interactions with our staff, systems, and processes.
- Information provided by third parties, such as recruitment agencies, or via referrals or references (references are not sought without your express prior permission, and typically happen at the point of offer).

4. How the data records are stored

All personal data provided, collected, generated, or obtained will be stored in PeopleHR, a cloud services HR platform, engaged by us to help manage our recruitment and hiring processes.

We take appropriate measures to ensure that all personal data is kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. Within Segen, we limit access to your personal data within PeopleHR to those who have a genuine need to access it: the HR/Talent Team, the Hiring Manager for the role in question, interviewers/assessment reviewers for the role in question, the Executive Board, and the Director of the team where the role in question sits (note that there may be overlap between the people in those positions). Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of electronically transmitted data. Any transmission therefore remains at your own risk.

5. How the data records are processed

a. Lawful Basis for Processing

Our lawful basis for the collection and processing of your personal data is for taking steps to enter into a contract of, or for, employment or services with you. We rely on legitimate business interest as the lawful basis on which we collect and use your personal data, specifically in the instances of collecting references and running background checks.

b. Purposes of Processing

We use information held about you in a number of ways, including but not limited to:

- Considering your application in respect of the role for which you have applied.
- Considering your application in respect of other roles at Segen, both at present and in the future (see *How Long We Keep Your Personal Data* below for more information on our data retention policy).
- Communicating with you in respect of the/any recruitment process/es.
- Enhancing any information that we receive from you with information collected, generated, or obtained throughout our recruitment processes.
- To help both Segen improve the effectiveness and efficiency of their and our recruitment systems and processes.

c. Rights of Access, Correction, and Erasure

Under the UK General Data Protection Regulations (GDPR), you have a number of important rights, including the right to access the personal data we hold about you, and to request corrections or partial/full erasure. We have taken steps to ensure speedy compliance with any such request.

All personal data held by Segen about you is stored in PeopleHR, our recruitment system. Functionality exists within the system to export all data relating to specific individuals. This functionality is only employed in the event an individual explicitly requests access to, or a copy of, the personal data we hold about them. The file includes personal information (name, email address, postal address, title etc.), application details (the role you applied for, when, via what channel, information submitted on the application form, work eligibility status etc.), recruitment progress (status, stage, interviewers/assessment reviewers, feedback from those dealing with your application, rejection reasons, offer details etc.), and any documents submitted, or subsequently provided or obtained. In the event you make an explicit request to access this data, Segen will generate the abovementioned data file and share this with you within 30 days of the request.

In order to correct any inaccuracies in your personal data held by Segen, you must make an explicit request to us, clearly indicating which information is in need of amendment, along with the correct information to take its place. Segen will act on personal data correction requests within five working days of receipt, and send a confirmation email to you upon resolution of the issue/s.

In order to request partial or full erasure of your personal data, you must make an explicit request to us. In the event you desire a partial erasure, you must clearly indicate which data points you would like to be erased. If you do not clearly indicate which data points you would like to have erased in a partial erasure, we reserve the right to delete all personal data we hold about/on you. Segen reserves the right to escalate any partial erasure request into a full erasure at our discretion; you will be notified of this outcome via email immediately before the erasure if we opt for the escalation. In the event you desire a full erasure, you must clearly indicate this in your request. Segen will act on partial and full erasure requests within five working days of receipt, however, no confirmation email will be sent following the completion of the request.

Please note that your right to have your personal data erased is not an absolute right, and we reserve the right to refuse such a request, where there is an appropriate legal justification for doing so. For example, we must retain candidate/application data for a period of six months following a rejection notice. You will be notified accordingly in the event we are unable to process your data erasure request.

If, at any point, you would like to make a request for access, correction, or erasure of your personal data held by Segen, you should email careers@segen.co.uk, providing enough information for us to be able to identify you in our system and carry out your request.

6. How We Process Your Data for Roles Outside of Your Formal Application

From time to time following your initial engagement with our recruitment processes, we may unilaterally decide to consider your application for another role at Segen. This may occur:

- At the time of your original application when, following an initial review of your CV, we conclude you would be better suited to a different opportunity currently vacant at Segen.
- At some point after your original application, when we chose to reactive your status as a candidate for a new opportunity in future.

In either scenario, our recruitment team will inform you of this decision via email, and you will have the opportunity to confirm your interest in the new role or to decline our consideration. Equally, the abovementioned rights of access, correction, and erasure will remain open to you for as long as we hold your personal data.

7. How Long We Keep Your Personal Data

We will keep personal data for the following periods of time:

CVs and interview notes for unsuccessful job applicants	6–12 months
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After the retention period has elapsed all data will be destroyed securely in line with our data destruction policy. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. All data held on our HRIS system will be removed automatically. Any physical copied will be destroyed. In some circumstances, we will anonymise your personal information so that it can no longer be associated with you, in which case we will use such information without further notice to you.

In order to request that your personal data be deleted ahead of the deadline, you must follow the instructions outlined in the section Rights of Access, Correction, and Erasure

8. How to Complain

We hope that we can resolve any query or concern you raise about our use of your personal data, however, if you are not satisfied with our processes or approach, the GDPR gives you the right to file a complaint with a supervisory authority, in particular in the UK or in the European Union (or European Economic Area) state where you work, live, or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <http://ico.org.uk/concerns/> or on 0303 123 1113.

You may also be able to claim compensation for damages caused by a breach of the GDPR or DPA. For further information on your rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office](#).

Contacting Segen

If you have any questions, queries, or issues relating to our recruitment policies and processes, or how they relate to our adherence to both the GDPR and DPA, then please contact careers@segen.co.uk.