

# **FOX MARKETING SERVICES MC LIMITED**

## **PRIVACY POLICY – Recruitment and Employment**

We are Fox Marketing Services MC Limited, company registration number 1539760, located at Unit 2C Wyvern House, Longfield Road, Tunbridge Wells, Kent TN2 3EY

We maintain the security and performance of our data handling systems and website through controls which are part of our Information Security Management System (ISMS) complying with the requirements of ISO 27001.

We have carried out assessments of the legal basis for processing personal data and have concluded that this is necessary on the grounds of contractual and legal obligations together with our legitimate interests for the use of employee data for our employment interests.

### **How we use your information**

This Privacy Policy tells you what to expect when we collect and process personal information. For employment related personal data, the legal basis for this is our legitimate interests, namely the protection and assertion of legal rights and/or the performance or creation of a contract between you and us as an employer and/or employment and fiscal legal obligations.

We will not store any of your information outside of the European Economic Area [EEA].

Should we decide to process any personal data for a purpose other than that for which it was collected, we will provide you with information on that other purpose and with any relevant further information prior to that further processing.

### **Visitors to our websites**

When you visit our website we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.

We also hold the IP addresses of visitors to the website.

We will store this data for a minimum of 2 years.

Where we want to collect personal data we will make this clear and will explain what we intend to do with it.

By continued use of our website, you consent to the Company collecting analytical and professional information about you in accordance with the terms set out in this Policy. You also consent to the Company using the analytical and professional information for market research, marketing, sales, customer relationship management (CRM), operational, financial and legal purposes in accordance with the terms set out in this Policy.

## **Cookies**

We may automatically log personal data or link information automatically logged by other means with personal data about specific individuals. However, we will only use this information to help us respond to queries you may have and we will not pass this information on to any third parties.

The Internet browser that you use may make use of a feature called a "cookie" to assign identification to your computer. We do not use cookies to store personal data or to link personal data to non-personal data, unless you have first agreed to this by selecting the "Remember Me" option. If you select this option, a cookie will be placed on your computer which will allow our website to recognise you when you return to our website. No personal information will be stored in this cookie.

We may use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit [www.aboutcookies.org](http://www.aboutcookies.org) for detailed guidance.

Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete our cookies having visited the site.

## **Applicants, current and former employees**

We are the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at the address given at the end of this Policy, under "Contact Us"

### **What will we do with the information you provide to us?**

All of the information you provide during the process will only be used for the purpose of progressing your application, and to fulfil contractual and legal or regulatory requirements if you are offered a position.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area [EEA]. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

### **What information do we ask for, and why?**

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. If you don't provide what we ask for it could affect your application and our ability to offer you a position in our company.

### **Application stage**

We may ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our hiring Managers will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our HR team and hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

### **Shortlisting**

Our hiring managers shortlist applications for interview. They will be provided with your name and contact details but not with your equal opportunities information if you have provided it.

### **Assessments**

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by us.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of 1 year. If you say yes, we would proactively contact you should any further suitable vacancies arise.

## **Conditional offer**

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications, if relevant – you will be asked to attend our office with original documents, we will take copies.
- If required for the job role, we will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We may also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work

## **Post start date**

Some roles require a higher level of security clearance. If this is the case, then you will be asked to submit information to a third party to obtain a Disclosure and Barring Service [DBS] check.

## **Use of data processors**

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

If you are employed by us, relevant details about you will be provided to our payroll services processor. This will include your name, bank details, address, date of birth, National Insurance Number and salary.

Likewise, your details will be provided to the administrators of our Pension Scheme. You will be auto-enrolled into the pension scheme and details provided to the administrators will be your name, date of birth, National Insurance number and salary. Your bank details will not be passed to the administrators at this time.

### **How long is the information retained for?**

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 1 year from the closure of the recruitment campaign.

Information generated throughout the assessment process, for example interview notes, is retained by us for 1 year following the closure of the recruitment campaign.

Equal opportunities information is retained for 1 year following the closure of the recruitment campaign whether you are successful or not.

### **How we make decisions about recruitment?**

Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account.

You are able to ask about decisions made about your application by speaking to your contact within our HR team.

Applications should be sent directly to us. Once we have considered your application, if we are interested in speaking to you further, we'll contact you using the details you provided.

We might ask you to provide more information about your skills and experience or invite you to an interview.

If we do not have any suitable work at the time, we will let you know but we might ask you if you would like us to retain your application so that we can proactively contact you about possible opportunities in the future. If you say yes, we will keep your application for 1 year.

We might also ask you to complete our pre-employment checks or to obtain security clearance, both of which are described in this Policy above. Whether you need to do this will depend on the type of work you would be doing for us.

We ask for this information so that we fulfil our obligations to avoid conflicts of interest and to protect the information we hold.

It will be retained for the duration of your time with us plus 6 years following the end of your employment.

## **Email**

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

## **Complaints**

When we receive a complaint from a person or company we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any staff members involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

## **Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the following address. We may make a small charge for this service.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

## **How to contact us**

Please contact us if you have any questions about our Privacy Policy or information we hold about you:

Write to us: The HR Manager, Fox Marketing Services MC Limited, Unit 2C Wyvern House, Longfield Road, Tunbridge Wells, Kent TN2 3EY