

# Privacy Policy - Recruitment

**Data Controller: Persimmon Plc (which for the purposes of this note includes all companies in the Persimmon Group including but not limited to Persimmon Homes Limited, Charles Church Developments Limited and Space 4 Limited) (“we” or “the Company”) all of Persimmon House, Fulford, York, YO19 4FE**

As part of any recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. We are registered as a Data Controller with the Information Commissioners Office.

## What information does the Company collect?

The Company may collect a range of information about you during the recruitment process. This can include:

- o your name, address and contact details, including email address and telephone number;
- o details of your qualifications, skills, experience and employment history;
- o information about your current level of remuneration, including benefit entitlements;
- o whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process; and
- o information about your entitlement to work in the United Kingdom (“UK”).

The Company collects this information in a variety of ways. For example, data might be contained in CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The Company may also collect personal data about you from third parties, such as references supplied by former employers. For certain roles this information may be collected by agencies undertaking pre-employment screening on our behalf. If such screening is undertaken for your role, you will be required to give certain information to the agency responsible for carrying it out, at which point they will inform you of your full rights and how they will handle that data at the time you are asked to provide it. Data will be stored in a range of different places, including on your application record, in HR and recruitment management systems and on other IT systems (including email).

## Why does the Company process personal data?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Company needs to process data because it is necessary to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment, tax, social security and social law.

If your application is successful, the Company will use your data for the purpose of entering into an employment contract with you, at which point you will be issued with a further privacy notice.

If your application is unsuccessful, the Company will keep your personal data on file in case there are future employment opportunities for which you may be suited. The Company will rely on legitimate business interests to hold your data which will be held for a maximum of 12 calendar months from the end of the particular recruitment process.

## **Who has access to data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR department, personnel in the relevant office that are involved in the recruitment process, including managers, PAs and secretaries in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you and in the case of certain job roles, with an agency that will carry out pre-employment screening on the Company's behalf.

The Company will not transfer your data outside the UK or the European Economic Area.

## **How does the Company protect data?**

The Company takes the security of your data seriously. It has 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. These include measures such as the Group Policy, the encryption and/or password protection of relevant data storage and transmissions and the Persimmon Cloud.

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## For how long does the Company keep data?

If your application for employment is unsuccessful, your data will be held on file for a maximum of 12 months.

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 (either by reference to Company Group Policy or directly).

## Your rights

As a data subject, you have a number of rights. You can:

- o access and obtain a copy of your data on request;
- o require the Company to change incorrect or incomplete data;
- o require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- o object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- o ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact The Company Secretarial Department, Persimmon Plc, Persimmon House, Fulford, York, YO19 4FE, [company.secretarial@persimmonhomes.com](mailto:company.secretarial@persimmonhomes.com).

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113. [www.ico.org.uk](http://www.ico.org.uk).

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all.

## Automated decision-making

Some of the recruitment processes operated on behalf of the Company may be based solely on automated decision-making. Where you are asked to answer specific questions about your application via an online recruitment portal, your answers may be assessed by the recruitment portal before your application is forwarded to the Company for consideration.