

## Applicant Privacy Notice

1. **Data controller: The Army Families Federation, ('AFF')** a charitable incorporated organisation registered in England and Wales with registered charity number 1176393 and a charity registered in Scotland with registered charity number SC048282 having its principal office at IDL 414, Floor 1, Zone 6, Ramillies Building, Marlborough Lines, Monxton Road, Andover SP11 8HJ
2. As part of any recruitment process, AFF collects and processes personal data relating to job applicants. AFF is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information does AFF collect?

3. AFF collects a range of information about you. This includes:
  - your name, address and contact details, including email address and telephone number
  - details of your qualifications, skills, experience and employment history
  - information about your current level of remuneration, including benefit entitlements
  - whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process, and
  - information about your entitlement to work in the UK.
4. AFF may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.
5. AFF 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. AFF will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.
6. Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### Why does AFF process your personal data?

7. AFF needs to process your personal data in order to consider your application for employment. It may also need to process your data to enter into a contract with you.
8. In some cases, AFF needs to process data 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.

9. AFF 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 AFF to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. AFF may also need to process data from job applicants to respond to and defend against legal claims.
10. AFF may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics and to promote equal opportunities. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. AFF processes such information to carry out its obligations and exercise specific rights in relation to employment.
11. For some roles, AFF is obliged to seek information about criminal convictions and offences or other circumstances that may prevent you from taking up a senior management role. Where AFF 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.
12. AFF will not use your data for any purpose other than the recruitment exercise for which you have applied.

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

13. Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area for which you may be considered and business support staff if access to the data is necessary for the performance of their roles.
14. AFF will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. AFF 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 (for specific posts only).
15. AFF will not transfer your data outside the European Economic Area.

### **How does AFF protect data?**

16. AFF 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.

## For how long does AFF keep data?

17. If your application for employment is unsuccessful, AFF will hold your data on file for six months after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed. In some instances, AFF may ask your permission to keep your personal data in relation to your application for up to 12 months. This may occur where, for example, future recruitment is planned that you may be suitable to interview for and AFF would like to contact you again to include you in this process.
18. 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.
19. Some roles within AFF involve working remotely and the opportunity therefore to obtain, check and copy your evidence of your eligibility to work in the UK may only arise at interview. In this case, we will ask you to bring your documentary evidence to your interview and will check it and take a copy. We will retain this evidence for the duration of the interview process and until an offer of employment is made and accepted by the successful candidate. If you are the successful candidate, this evidence will then be placed on your employee file. If you are not successful, we will retain the evidence alongside your application for a period of six months after the interview took place and then it will be securely disposed of.

## Your rights

20. As a data subject, you have a number of rights. You can:
  - access and obtain a copy of your data on request
  - require AFF to change incorrect or incomplete data
  - require AFF to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing, and
  - object to the processing of your data where AFF is relying on its legitimate interests as the legal ground for processing.
21. If you would like to exercise any of these rights, please email [data@aff.org.uk](mailto:data@aff.org.uk) or write to the data controller office address (above).
22. If you believe that AFF has not complied with your data protection rights, you can complain to the Information Commissioner.

## What if you do not provide personal data?

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

## Automated decision-making

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

## Transferring your data outside the EEA

25. We do not routinely transfer data from the UK to countries in the EU, the EEA or elsewhere. Where we do (for example in relation to staff working outside the UK or in the delivery of our services outside the UK), we will ensure the adequacy of the protections available to us in relation to that data in accordance with the UK GDPR adequacy regulations, and we will provide employees affected with more specific information about how this affects processing of their data.

## Changes to this policy

This policy may refer to your contractual terms or statutory rights but is not intended to be contractual in nature. AFF reserves the right to review, amend or replace the contents from time to time in accordance with the law and best practice.

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