Applicant Privacy Notice

Policy Summary

As part of any recruitment process, Southern Co-op* collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does Southern Co-op collect?

We collect 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 we need to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

We collect this information in a variety of ways. For example, data might be contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

We will also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks, where necessary for the role. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

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).

Please let us know if any of your data is incorrect or inaccurate and we will update it.

Why does Southern Co-op process personal data?

We need to process data to take steps, at your request, prior to entering into a contract with you. We also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure we are complying with our legal obligations. For example, we are required to check eligibility to work in the UK before employment starts.

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

* References to Southern Co-op includes all employing companies within the Group, including The Southern Co-operative Limited, Mutual Services (Portsmouth) Limited and South of England Funeral Partners Limited

Where we rely on legitimate interests as a reason for processing data, we will consider whether or not those interests are overridden by the rights and freedoms of applicants and provided we have concluded that they are not, we are entitled to process the data on that basis.

We process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our legal obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as ethnic origin, marital status, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, we are obliged to seek specific information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our legal obligations and exercise specific rights in relation to employment. This currently applies in respect of Store Manager and Duty Manager roles in order to obtain a Personal Alcohol Licence.

If your application is unsuccessful, we will keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time by emailing the recruitment team at recruitment@southerncoops.co.uk or the Data Protection Officer at dataprotectionofficer@southerncoops.co.uk.

Automated decision-making

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

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We may then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and, for some roles, the Disclosure and Barring Service to obtain necessary criminal records checks.

Your data may be transferred to countries outside the European Economic Area (EEA) provided that certain conditions are met to ensure that your data is held securely and consistently with data protection legislation.

How does Southern Co-op protect data?

We take the security of your data seriously. We have 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 colleagues in the proper performance of their duties.

For how long does Southern Co-op keep data?

If your application for employment is unsuccessful, we will hold your data on file for 12 months after which it is securely destroyed

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. Your data will then be held for periods in accordance with our Data Retention Policy. The way in which we process your data and your rights will be as set out in our Colleague Privacy Notice which will be provided to you on commencement of employment.

Your rights

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

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

If you would like to exercise any of these rights, please contact the Data Protection Officer, Southern Co-op, 1000 Lakeside, Western Road, Portsmouth, PO3 6FE dataprotectionofficer@southerncoops.co.uk

You can make a subject access request by completing a Subject Access Request Form which is available via our website. There is no fee for making a Subject Access Request. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner's Office (ICO). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance at dataprotectionofficer@southerncoops.co.uk.

The full contact details for the ICO, including a helpline number, can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.

What if you do not provide personal data?

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

Identity and contact details of data controller and data protection officer

The Southern Co-operative Limited is the controller and processor of data for the purposes of the Data Protection Act 2018 and the General Data Protection Regulation:

Data Protection Officer, Southern Co-op, 1000 Lakeside, Western Road Portsmouth PO6 3FE
dataprotectionofficer@southerncoops.co.uk

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