

# Data Protection Notice For Recruitment



## 1. INTRODUCTION

- 1.1 Clinisupplies is committed to protecting the privacy of anyone who applies for employment or other engagement with Clinisupplies (**Candidates**).
- 1.2 We set out below information regarding Clinisupplies' collection, analysis, disclosure and other use of Candidates' personal information in accordance with the UK GDPR and Data Protection Act 2018. If you accept employment with or are otherwise engaged by Clinisupplies we will, of course, collect more information about you and make other uses of your information – this will be explained to you as part of the onboarding process.

## 2. INFORMATION COLLECTED FROM CANDIDATES

### Where do you collect information from?

- 2.1 Clinisupplies collects information about Candidates in the course of the recruitment process. Some of this information is collected directly from you (for example, in forms that you are asked to complete, or in interviews or through the completion of tests). Other information is generated automatically when you use or otherwise interact with Clinisupplies' systems (for example, when you log in to our website); or provided to us by third parties (for example, recruitment agencies, referees, educational institutions and other employees), including by third party service providers or publicly available sources for anti-money-laundering, background checking (including criminal checks where applicable) and similar purposes, and to protect our business and comply with our legal and regulatory obligations.
- 2.2 Clinisupplies may also collect information from third party psychometric test providers, which will be considered by us during the recruitment process; however no decisions in respect of your application will be made by automated means.

### What types of information do you collect?

- 2.3 The information we collect about Candidates includes:
  - 2.3.1 basic information about yourself, such as name, contact details and information provided to verify your identity (e.g. passport photo or driver's license);
  - 2.3.2 citizenship, residency and work permit status and other immigration related information regarding your employment and educational history;

- 2.3.3 other information about yourself that you provide in a CV;
  - 2.3.4 where applicable, any professional registrations; and
  - 2.3.5 where applicable, criminal records checks,
- 2.4 Generally you should assume that, if we ask you for information, we need it for our recruitment purposes. In some cases we may not be able to consider your application if you cannot provide information that we request. There may be occasions where we need information to comply with a legal obligation, or conversely where provision of information is entirely optional and would not affect your application – we will let you know if this is the case.

### 3. **OUR USE OF YOUR INFORMATION**

#### **How do you use the information you collect about me?**

- 3.1 We use Candidate information in accordance with applicable law to manage the recruitment process and assess you for employment or other engagement. We will also use your personal information to monitor and improve our recruitment processes and for other related purposes such as equal opportunity monitoring (e.g. gender pay gap reporting) which will not involve data regarding your race, ethnicity or other types of special category personal data., We use personal information to help us comply with legal and regulatory requirements, and to also ensure the security of our business and purposes relating to legal claims made by or against us.
- 3.2 Some roles require us to carry out criminal background checks, mainly for our Sales and Nursing teams. Sales require the basic check and Nurses require the enhanced checks in line with legal and hospital requirements. Clinisupplies will only process criminal offence data in line with employment and health care purposes under Schedule 1, Part 1 of the Data Protection Act 2018 and we will maintain the appropriate policy document as well.
- 3.3 The response from your DBS check will be treated with care and confidence and will be included as part of your employee file, which will be kept safely and securely in with our security measures. We will carry out background checks on our Sales and Nursing teams members every 2 years in line with legal and hospital requirements.
- 3.4 We use a third-party company called UCheck (<https://www.ucheck.co.uk/>) to help us carry out criminal background checks. If you have any questions or concerns to this, you can contact us using our contact details.

#### **What happens if my application is unsuccessful?**

- 3.5 If you are unsuccessful in your application, we may also retain your Candidate information and use it to assess your suitability for future positions and roles within the organisation (see paragraph 6 for further details).

### **Will you ask for my consent?**

- 3.6 We are entitled to use, disclose and otherwise process Candidates' (and former Candidates') information as described in this notice because we need to do so for the purposes above and for our legitimate interests. We do not rely on a Candidates' consent to collect, use or process their personal information, other than in exceptional circumstances. – In those circumstances we will ask for your consent on a case-by-case basis, which can be refused or later withdrawn at any time.

## **4. DISCLOSURE OF CANDIDATE INFORMATION**

### **Who do you disclose my information to?**

- 4.1 Clinisupplies may disclose Candidate information, where reasonably necessary for various purposes (but not limited to) as described below:

4.1.1 recruitment agencies working with us in relation to your potential recruitment;

4.1.2 other service providers processing Candidate information on our behalf in the course of supporting our business and operations (including any third party psychometric test providers);

4.1.3 to any person who takes over our business and assets, or relevant parts of them;

4.1.4 other members of the Clinisupplies group who may be outside the UK;

4.1.5 third parties to whom Clinisupplies is required to disclose information by law or regulatory requirement (including litigation counterparties); and

4.1.6 competent regulatory and prosecuting authorities.

- 4.2 If you give us names of potential referees, we may disclose the fact that you are applying to work with us to them when we ask them for references.

## **5. AUTOMATED DECISION MAKING**

- 5.1 As part our recruitment process, we do not carry out any automated decision-making.

## **6. RETENTION AND DELETION**

### **How long will you retain my information for?**

- 6.1 We will generally retain information about you throughout the recruitment process. Some information will be retained after the process ends, either because you are employed or otherwise engaged by us or, if your application is withdrawn or unsuccessful, because we retain information in case you apply to work for us again (or a suitable position within the Clinisupplies group becomes available) or a recruitment-related dispute arises between us. Clinisupplies will delete or restrict/discontinue the

processing of personal data when it is no longer needed after the recruitment process ends, in accordance with their own policies and in accordance with applicable law.

- 6.2 As a general principle, we do not retain Candidate information (except in anonymised /statistical form) for longer than we need it, given the purposes for which it is held. This is typically 6 months after the applicable role has been filled.

## 7. RIGHTS AND QUESTIONS

### **What rights do I have in respect of the information you hold about me?**

- 7.1 With limited exceptions, Candidates have legal rights including the right to be given copies of the personal information that we hold about them and to require inaccurate information to be corrected. In some circumstances you can also require us to delete (or stop making active use of) your personal information.

### **Who do I contact about this notice?**

- 7.2 If you wish to exercise any of these rights or have other questions about our Candidate information processing or related policies, please contact the Compliance Manager at Clinisupplies Limited, 1 Blackmoor Lane, Croxley Park, Watford, WD18 8GA, [privacy@clinisupplies.co.uk](mailto:privacy@clinisupplies.co.uk).

### **Can I make complaints to the supervisory authority?**

- 7.3 You also have the right, at any time, to lodge a complaint about our processing of your personal information with your local supervisory authority. The details for the UK supervisory authority, the Information Commissioners Office (the ICO) can be found here: <https://ico.org.uk/global/contact-us/>.

### **Data protection officer**

- 7.4 We have appointed The DPO Centre ([www.dpocentre.com](http://www.dpocentre.com)) as our data protection officer (DPO) to oversee compliance with this privacy notice as well as our overall data protection compliance. If you have any questions about this privacy notice or how we handle your personal information you can send an email by [DPO@clinisupplies.co.uk](mailto:DPO@clinisupplies.co.uk) or telephone: 0203 797 1289, where your data protection query will be forwarded onto them who will help look into your query or complaint you have sent through.