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# Data controller/Organisation:

Peppermint Technology Ltd

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# 1. What information does Peppermint collect?

Peppermint 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 Peppermint needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK.

Peppermint may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes (submitted directed by an applicant or via a third party), obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Peppermint 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. Peppermint will seek information from third parties once a job offer has been made to you and will inform you that it is doing so. There are occasions where we may seek references before an offer is made. In these cases, we will obtain your consent prior to 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).

# 2. Why does Peppermint process personal data?

Peppermint needs to process data prior to and upon entering into a contract with you.

In some cases, Peppermint 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.

Peppermint 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 Peppermint to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to



whom to offer a job. Peppermint may also need to process data from job applicants to respond to and defend against legal claims.

Peppermint may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. Peppermint processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, Peppermint is obliged to seek information about criminal convictions and offences. Where Peppermint 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.

### 3. Who has access to data?

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 with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Peppermint will not share your data with third parties, unless it is required to do so by law or if your application for employment is successful and it makes you an offer of employment. Peppermint 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.

Peppermint will not transfer your data outside the European Economic Area.

### 4. How does Peppermint protect data?

Peppermint 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. Peppermint has policies outlining how it adheres to Data Protection and Information Security. Employees are appropriately trained, and internal IT protocols are upheld in order to maintain information security.



## 5. For how long does Peppermint keep data?

If an application is unsuccessful, Peppermint will keep a record of your application for legitimate business reasons for a period of up to 12 months. At the end of that period, or sooner if you withdraw your consent, your data is deleted or 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. The periods for which your data will be held will be provided to you in a new privacy notice.

## 6. Your rights

As a data subject, you have a number of rights. You can exercise your individual rights under the Data Protection Act at any time by submitted a request to your line manager or HR. If you believe that Peppermint has not complied with your data protection rights, you can complain to the Information Commissioner.

## 7. What if you do not provide personal data?

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

## 8. Automated decision-making

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



## 9. Document Control

### 9.1 Review Period

This policy shall be reviewed against ICO guidance annually.

### 9.2 Version Control

Version No	Date	Updated By	Summary of Changes
V1.0	10 <sup>th</sup> May 2018	<b>Emily Farrow</b>	Circulated to internal Legal Counsel and Cloud Product Manager
V1.1	27 <sup>th</sup> May 2020	<b>James Carter</b>	Update format, correct contact details

### 9.3 Approval

Name	Position	Version Approved	Signature	Date (dd/mmm/yyyy)
E Farrow	Head of People Performance	1.1		27/05/20