



JHC Recruitment Privacy Notice

1. How JHC Systems Limited ("We", "us") use your information

- a) As part of our recruitment process, We collect and process personal data relating to job applications. The legal basis of processing is consent and/or legitimate interest.
- b) We may receive personal data from you directly sent to us or via one of our contracted Recruitment Agencies, or other third party, or from a past employer or other referee.
- c) We may collect and process sensitive personal data relating to job applicants including, as appropriate:
 - i) information about an applicant's physical or mental health in order to make reasonable adjustments during the recruitment process.
- d) More detailed information about the personal data We collect and process and the purposes We use it for are set out in paragraphs 2 and 3 below.

2. What data do We collect and process?

- a) Names, titles, and preferred names. Contact details such as telephone numbers, home addresses, social media identities and content and email addresses;
- b) Demographic information such as right to work in the UK;
- c) Details of skills, experience and employment history, including start and end dates with previous employers;
- d) Details of education, academic/professional qualifications;
- e) Sensitive Personal data: personal characteristics and circumstances of sensitive nature such as mental and physical health and the copy of your passport or other ID;
- f) Any other personal data that job applicants are sharing with us in their CV or otherwise.

3. For what purposes do We use this data?

- a) Enabling JHC to assess and confirm a candidate's suitability for employment or other engagement and decide whom to offer a job or other role;

- b) Contact you by email or phone or at your other address to keep you updated about the application status and organise interviews;
- c) Complying with legal, regulatory and client contractual obligations. For example, it is required to check a successful applicant's right to work in the UK before employment starts;
- d) Obtain details of medical conditions, to ensure that it complies with duties in relation to individuals with disabilities and meet its obligations under health and safety law;
- e) Establishing, exercising, enforcing or defending legal claims.

4. How long We will keep this information

- a) We will hold your personal data, interview notes for 12 months after the end of the relevant recruitment campaign for regulatory purposes and to defend or pursue any legal claims. At the end of that period your data is deleted.
- b) If your application for employment is successful, We will send you a new Privacy Notice and personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment and after your employment as provided for in that subsequent Privacy Notice.

5. Our approach to information security

- a) To protect your information, We have policies, standards and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in secure and sensible manner and all systems that can access the information have the necessary security measures in place. To accomplish this all Our Employees, contractors and sub-contractors have roles and responsibilities defined in those policies and procedures.
- b) In addition to these operational measures We also use a range of technologies and security systems to reinforce the policies.
- c) To make sure that these measures are suitable We perform audits to identify the areas of weaknesses and non-compliance. Additionally, all areas of the organisation are constantly



monitored and measured to identify problems and issues before they arise.

6. Your rights

- a) When exercising any of the rights listed below, in order to process your request, We may need to verify your identity for your security. In such cases your response will be necessary before you can exercise these rights.
- b) The right to access information We hold on you
 - i) At any point you can contact us to request the information We hold on you as well as why We have that information, who has access to the information and where We obtained the information from. Once We have received your request We will respond within 30 days.
 - ii) There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- c) The right to correct and update the information We hold on you
 - i) If the data We hold on you is out of date, incomplete or incorrect, you have to inform us and your data will be updated.
- d) The right to have your information erased
 - i) If you feel that We should no longer be using your data or that We are illegally using your data, you can request the erasure of the data We hold from you.
 - ii) When We receive your request We will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because We need it for our legitimate business or regulatory purpose(s)).
- e) The right to object to processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.
 - i) You have the right to request that We stop processing your data. Upon receiving the request, We will contact you and let you know if We are able to comply or if We have legitimate grounds to continue to process your data. Even after you exercise your right to object, We may continue to hold your

data to comply with your other rights or to bring or defend legal claims.

- f) The right to data portability
 - i) You have the right to request that We transfer your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

7. What if you do not provide personal data

- a) You are under no statutory or contractual obligation to provide data to JHC 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.

8. Sharing your information

- a) We will not share your personal data with third parties, other than for the purposes of undertaking any background checks and reference checks, unless your application for employment is successful.
- b) We may will transfer your data outside the European Economic Area when We are processing applicants data in some Cloud Services. We ensure that your data is adequately protected and We have entered into Model Contract Clauses with the provider or have other safeguards in place.

9. Contact details

If you have any queries about this notice, need further information or wish to lodge a complaint you can use the details below to contact the relevant party. In the event that We have been unable to resolve your concerns you can raise the matter with the ICO directly.

JHC's Data Protection Officer:
dataprotection@jhc.financial

or email HR: hrteam@jhc.financial

Data Controller: JHC SYSTEMS LIMITED
Temple Point, 1 Temple Row, Birmingham B2
5LG, company number 08729370, ICO
registration number ZA049386