

Data controller: The Hill Brush Company Ltd (Hillbrush, The Company, We, Our, Us)

As part of any recruitment process, Hillbrush collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and uses that data and to meeting our data protection obligations.

What information does Hillbrush collect?

Hillbrush 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 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, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The Company will also collect personal data about you from third parties, such as references supplied by former employers. 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. Where we need to seek or share your information with third parties prior to an offer being made, this will be done with your permission only and you will be able to withdraw your consent for this at any time.

Data will be stored in a range of different secure places, including on your application record, in HR management systems and on other IT systems (including email).

Why does Hillbrush process personal data?

The Company needs to process data to take the necessary 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 that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

Hillbrush 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 us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Hillbrush processes 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 obligations and exercise specific rights in relation to employment.

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

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.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR, 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.

Your information may be shared with third parties with your express consent during the recruitment process for the purposes of further assessment for the role you may be applying for. For example, Hillbrush may provide your contact details to a provider of psychometric testing as part of the interview process. Hillbrush will ask for your consent before we process your data for this purpose and you are free to withdraw your consent at any time.

In any other situation where a role does not require further assessment Hillbrush will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you, and employment background check providers to obtain necessary background checks.

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

How does Hillbrush 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 employees in the proper performance of their duties.

For how long does Hillbrush keep data?

If your application for employment is unsuccessful, we will hold your data on file for a maximum of 12 months after the end of the relevant recruitment process for consideration for future employment opportunities. At the end of that period or once 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.

Automated decision-making

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

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 Hillbrush to change incorrect or incomplete data;
- Require us 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 we are relying on our legitimate interests as the legal ground for processing; and
- Ask Hillbrush to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact us by emailing data.protection@hillbrush.com.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Hillbrush 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.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Law relating to this document

This Privacy Notice is created in line with the following pieces of legislation:

- General Data Protection Regulation (2016/679 EU)
- Data Protection Act 2018