

Motability Applicant Privacy Notice

What is the purpose of this document?

Motability is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are required to read and acknowledge you have understood this privacy notice because you are applying to work for us. This notice explains how and why your personal data will be used, namely for the purposes of the recruitment exercise, and for how long it will usually be retained. This notice will also detail certain information that must be provided to you under the General Data Protection Regulation (GDPR).

Data protection principles

We will comply with data protection laws and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that have clearly been explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes as explained to you and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes explained to you.
- Kept securely.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, address, telephone number, personal email address, employment history, qualifications.
- Any information you provide to us during an interview.
- Where applicable to the role for which you have applied (as specified in the job description), information about your credit history.
- Information provided in your personal statement.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records, and reasonable adjustments you may require.
- Where applicable to the role for which you have applied (as specified in the job description), information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about applicants from the following sources:

- You, the applicant.
- The recruitment agency/partner, from which we collect the following categories of data; personal contact details, details of your qualifications, employment history, details of remuneration you receive.
- Where applicable to the role for which you have applied (as specified in the job description), Experian or Personnel Checks, our background check and credit reference providers, from which we collect the following categories of data: details of your credit history and information about criminal convictions and offences.

Motability Applicant Privacy Notice

- Your named referees, from whom we collect the following categories of data: details of the position you held, dates of your employment, your reason for leaving and responses to our checklist of behavioural qualities.

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you since it would be beneficial to our business to appoint someone to the role for which you have applied.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and covering letter and/or your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references, and where applicable for the position and you have provided your consent carry out a criminal record and credit history check before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We may use information about your disability status to provide appropriate adjustments during the recruitment process, for example if reasonable adjustments are required during your interview.

Information about criminal convictions

We will only process information about criminal convictions where this is a requirement for your role, as specified in your job description.

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required or entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Information about background checks

We will only process information about financial history, identity and residency where there is a requirement for your role, as specified in your job description.

Motability Applicant Privacy Notice

We will collect information about your financial history, identity and residency if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required or entitled to carry out a background check in order to satisfy ourselves that there is nothing in your financial history or identity and residency which makes you unsuitable for the role.

We have in place an appropriate policy document and safeguards which are required by law to maintain when processing such data.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might we share your personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: Experian or Personnel Checks, in order to undertake criminal record and credit history checks. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Transferring information outside the European Economic Area

We do not expect to transfer your personal information outside the European Economic Area. If circumstances changes and we may do so, then we will ensure that you have a similar degree of protection in respect of your personal information.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of twelve months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policies and procedures.

Motability Applicant Privacy Notice

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive details of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer (DPO) in writing.

Right to withdraw consent

If at any point during your application for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise, you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our DPO. Once we have received notification that you have withdrawn your consent, we will no longer process the personal data to which such consent relates and, subject to our retention policy, we will dispose of your personal data securely.

Data Protection Officer

We have appointed a DPO to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our in writing to Motability, Warwick House, Roydon Road, Harlow, Essex CM19 5PX, by email to dataprotectionofficer@motability.co.uk, (please mark all correspondence with “Data Protection Officer”), or you can call on **01279 635999**. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

Applicant Acknowledgment

By signing our application form you have acknowledged that you have read and understood Motability’s Applicant Privacy Notice.