



Privacy Notice - Candidates

Policy and Procedure



Privacy Notice

We are committed to being transparent about how we handle your personal information, to protect the privacy and security of your personal information and to meeting our obligations under Data Protection legislation. The purpose of this privacy notice is to make you aware of how we collect and use your personal information during the recruitment process.

As part of any recruitment process that we undertake, Libra Textiles Ltd (trading as Boundary Mill Stores) collects and processes personal information, or personal data, which relates to job applicants in order to assess a candidate's suitability for employment. This personal information may be held by Boundary Mill Stores on paper or in electronic format.

This privacy notice applies to all job applicants, whether they apply for a role directly or indirectly through an employment agency. This policy also applies to Banny's Ltd where appropriate.

The Data Controller is Libra Textiles Ltd, whose registered business address is Boundary Mill Stores, Head Office, Vivary Way, Colne, BB8 9NW. The Company's Data Protection Officer is the Finance Director.

Data Protection Principles

Under Data Protection legislation, there are several data protection principles that the Company must comply with. These provide that the personal data we hold about you must be:

- processed fairly, lawfully and in a transparent manner
- collected for specific, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary for the purposes of processing
- kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay
- not kept for longer than is necessary for its given purpose
- processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- comply with the relevant Data Protection legislation procedures for international transferring of personal data
- processed in line with your rights under Data Protection legislation.

Your Rights

The law on data protection gives you certain rights in relation to the data we hold about you. These are:

- the right to be informed
- the right of access
- the right for any inaccuracies to be corrected (rectification)
- the right to have information deleted (erasure)
- the right to restrict the processing of data



- the right to portability
- the right to object to the inclusion of any information
- the right to regulate any automated decision-making and profiling of personal data
- the right to complain to the Information Commissioners Office.

If you wish to exercise any of the rights explained above, or if you have any concerns as to how your data is processed, you can contact: HR Department, Boundary Mill Stores Head Office, Vivary Way, Colne, Lancashire BB8 9NW or you can email people@boundarymill.co.uk

What Types of Personal Information do we Hold?

Candidates who apply via the Careers page of the Company website will be required to consent to the processing of the following personal data in order to apply for a vacancy:

- your contact details, including your name, address, telephone number and personal email address
- personal information included in a CV, any application form, cover letter or interview notes
- references
- information about your right to work in the UK and copies of proof of right to work documentation
- copies of qualification certificates
- copy of driving licence
- other background check documentation
- details of your skills, qualifications, experience and work history with previous employers
- information about your current salary level, including benefits and pension entitlements
- your professional memberships

The Company may also collect, use and process the following special categories of your personal information (if applicable):

- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process
- information about criminal convictions and offences. We will only collect criminal conviction data where it is appropriate, given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage.



How Do We Collect Your Personal Information?

The Company collects personal information about you during the recruitment process either directly from you or sometimes from a third party such as an employment agency or an applicant tracking system (e.g. Vacancy Filler). We may also collect personal information, with your consent, from other external third parties such as references from current and former employers, information from background check providers, information from credit reference agencies and criminal record checks from the Disclosure and Barring Service (DBS). Other than employment agencies, the Company will only seek personal information from third parties during the recruitment process once an offer of employment or engagement has been made to you and we will inform you that we are doing so.

You are under no statutory or contractual obligation to provide personal information to the Company during the recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process your application without the relevant person data to do so.

Your personal information may be stored in different places, including on your application record, in the Company's HR management system and in other IT systems, such as the e-mail system.

Why and How Will Your Information Be Used?

We will only use your personal information where the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following circumstances:

- where we need to do so to take steps at your request prior to entering into a contract with you, or to enter into a contract with you
- where we need to comply with a legal obligation
- where it is necessary for our legitimate interests, or those of a third party, and your interests or your fundamental rights and freedoms do not override our interests.

We need all the types of personal information listed under "***What Types of Personal Information do we Hold?***" (see above) primarily to enable us to take steps at your request to enter into a contract with you, or to enter into a contract with you, and to enable us to comply with our legal obligations. In some cases, we may also use your personal information where it is necessary to pursue our legitimate interests, or those of a third party, provided that your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include: pursuing our business by employing employees, workers and contractors; managing the recruitment process; conducting due diligence on prospective staff and performing effective internal administration.

The purposes for which we are processing, or will process, your personal information are to:

- manage the recruitment process and assess your suitability for employment or



engagement

- decide to whom to offer a job
- comply with statutory and/or regulatory requirements and obligations, e.g. checking your right to work in the UK
- comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations
- ensure compliance with your statutory rights
- ensure effective HR, personnel management and business administration
- monitor equal opportunities
- enable us to establish, exercise or defend possible legal claims.

Please note that we may process your personal information without your consent in compliance with these rules, where this is required or permitted by law.

Who has Access to Your Personal Information?

Your personal information may be shared internally within the Company for the purposes of the recruitment exercise, including with members of the HR department, members of the recruitment team, managers in the department which has the vacancy and IT staff if access to your personal information is necessary for the performance of their roles.

The Company will only share your data with applicant tracking and application systems and will not share your personal information with any other third parties during the recruitment process unless your job application is successful and we make you an offer of employment or engagement. At that stage, we may also share your personal information with third parties (and their designated agents), including:

- external organisations for the purposes of conducting pre-employment reference and employment background checks
- the DBS, to obtain a criminal record check
- former employers, to obtain references (we will only do this with your prior consent)
- professional advisors e.g. lawyers.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

We may share your personal information with third parties to enter into a contract with you, where we need to comply with a legal obligation, or where it is necessary for our legitimate interests or those of a third party.

We do not share your data with bodies outside of the European Economic Area.



Protecting your Data

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed, used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from our Data Protection Officer.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information, to treat your data confidentially and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The Company also has procedures in place to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

For How Long Does the Company Keep Your Personal Information?

In line with data protection principles, we only keep your data for as long as we need it for and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful, and we have not sought consent or you have not provided consent to keep your data for the purpose of future suitable job vacancies, we will keep your data for six months once the recruitment exercise ends.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees which will be provided to you.

Automated Decision-Making

Automated decision-making is any form of automated processing of personal data where personal data is used to evaluate certain personal aspects relating to an individual. Automated decision-making occurs when an electronic system uses an individual's personal data to make a decision without human intervention.

We do not carry out any automated processing and do not take any decisions based solely on automated decision-making, including profiling.



Changes to this Privacy Notice

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

