



Recruitment Privacy Notice

What is this notice?

This is the 'Recruitment Privacy Notice' of City Facilities Management Holdings Limited.

City Facilities Management Holdings Limited is committed to protecting the privacy and security of personal information. This privacy statement covers a number of companies within the City group, which may process your personal information. Further information is provided at the *Legal Information* section at the end of this privacy statement.

This notice applies to individuals applying to work with us, including prospective employees, workers and contractors.

We are a data 'controller', which means we are responsible for deciding how we hold and use your personal information.

This notice explains how and why we will collect and use your personal information in the context of the recruitment process and your rights in relation to your personal information. We may amend this notice at any time.

Data Protection Officer (DPO)

We have appointed a data protection officer. If you have any questions about this privacy notice or how we handle your personal information please contact the DPO. They can be contacted via DPO@city-holdings.co.uk.

Your personal information

In this privacy notice, 'your personal information' means your personal data i.e. information about you from which you can be identified. The table lists your personal information that we may process.

Your 'personal information' does not include data where the identity has been removed (anonymous data).

It is important that your personal information is accurate and up to date. Please inform us if your personal information changes during the recruitment process.

Special categories of personal information

'Special categories of personal information' means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purpose of uniquely identifying you.

Data marked * in the table below is either directly included within these 'special categories' or may indirectly disclose special categories of personal information. We must have additional legal grounds for processing special categories of personal information, and these grounds are set out in the table below.



Where does your personal information come from?

The Company will collect personal information about you through the application and recruitment process, either directly from candidates or this information may also come from the following sources:

- Recruitment agencies may provide us with the following personal information
 - Personal contact details such as name, title, national insurance number, addresses, telephone numbers and personal email addresses
 - Right to work documentation
 - References
 - Other information including CV or cover letter as part of the application process
- Background check providers may provide us with the following personal information driver licence checks and convictions, criminal convictions from Disclosure and Barring Services, professional qualifications
- We may utilise agencies to gather information on leadership and behavioural skills, or to perform technical assessments on our behalf, in order to assess and determine suitability for roles. For example, this may include electrical testing for electrical engineer roles. .
- Former employers or other referees, whom you have given us permission to contact, may provide us with personal information pertaining to your suitability for the role.

If you would like more information on the source of your personal information please contact the Data Protection Officer.

Processing your personal information

We may process your personal information during and after the recruitment process. This may include collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

In general, we process your personal information for the reasons, and on the legal grounds set out in the table below, and also to:

- Retain records relating to the recruitment process
- Establish, exercise or defend legal claims
- Comply with the law or requirements of a regulator



- Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency).

Reason for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
Contact you regarding the recruitment process and any offer of work	To enter a contract	Personal contact details (including name, address, email, telephone number)
Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work	To enter a contract To comply with a legal obligation For our legitimate interests: <ul style="list-style-type: none"> • to select suitable employees, workers and contractors 	<ul style="list-style-type: none"> • Your application form, CV, any covering letter or email and interview notes • Results of the following recruitment tests: Skills or personality profile testing
If you have accepted an offer of work from us that is subject to such checks: <ul style="list-style-type: none"> • Take up references (from referees whom you have given us permission to contact) • Carry out background checks • Confirm your professional memberships, registrations and / or qualifications. 	To enter a contract To comply with a legal obligation For our legitimate interests: <ul style="list-style-type: none"> • to select suitable employees, workers and contractors 	<ul style="list-style-type: none"> • References and details of previous employers • Professional memberships, registrations and qualifications • Copy of your driving licence • Correspondence and results regarding the following background checks: e.g. Disclosure and barring checks.
Determine the terms of any potential contract between you and us	To enter a contract To comply with a legal obligation	Offer letter and proposed contract between you and us
At Interview stage and prior to accepting an offer of work, we will check you are legally entitled to work in the UK	To enter a contract To comply with a legal obligation	Documentation confirming your right to work in the UK
Establish whether you can undergo an assessment which forms part of the application process Consider reasonable adjustments to the recruitment process for disabled applicants	To enter a contract To comply with a legal obligation For our legitimate interests: <ul style="list-style-type: none"> • To select suitable employees, workers and contractors 	Information about a disability, the effects of that disability and special arrangements that may need to be made to the recruitment process as a result of that disability*



Reason for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
	<p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations 	
<p>Establish whether you are eligible for our guaranteed interview scheme for disabled applicants</p>	<p>To enter a contract</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> To select suitable employees, workers and contractors <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations To review equality of opportunity or treatment 	<p>Information about your disability status*</p>
<p>Establish whether you will be able to carry out a function that is intrinsic to the particular work</p> <p>If you have accepted an offer of work from us that is subject to such a check: assess your fitness to work via a health questionnaire or medical report</p>	<p>To enter a contract</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> To select suitable employees, workers and contractors <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations For the purposes of preventive or occupational medicine, or for the assessment of your working capacity 	<p>Health data and sickness records, including disability information*</p>
<p>Carry out equal opportunities monitoring</p>	<p>For our legitimate interests:</p> <ul style="list-style-type: none"> To review equality of opportunity or treatment <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> To review equality of opportunity or treatment 	<p>The following information you have provided via our equal opportunities monitoring form:</p> <ul style="list-style-type: none"> Health data, including disability information* Age and date of birth Marriage or civil partnership status* Gender



Reason for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
	<ul style="list-style-type: none">To exercise or perform employment law rights or obligations	<ul style="list-style-type: none">Information on gender reassignment*Data revealing race, religious beliefs or sexual orientation*

Information about criminal convictions

In such situations where we are legally entitled to, and where we determine a need to, we will collect information provided by you about criminal convictions as part of the recruitment process to enable us to make recruitment decisions and assess suitability for particular work.

We will process this information to enter a contract with you, to comply with a legal obligation, for our legitimate interests (in selecting suitable employees, workers and contractors), and to exercise or perform employment law rights or obligations.

For all roles, in such situations where we are legally entitled to, and where we determine a need to, we will request the following information at the application stage:

- Whether you have any unspent criminal convictions, driving convictions or pending prosecutions, to ensure we comply with legal obligations.

We may also collect information about criminal convictions through the Disclosure and Barring Services (DBS) which provides enhanced disclosure checking information about any criminal convictions relevant to the individual. Obtaining criminal conviction Information via DBS is only undertaken in limited situations based on specific role requirements. Where we undertake DBS checks this will require your consent in advance.

Data necessary for the contract

The table above identifies personal information that we may need in order to enable us to enter a contract with you. If you don't provide this data, we may not be able to proceed with the recruitment process or enter into such a contract.

Statutory requirement for you to provide your personal information

In some circumstances, the provision of your personal information is a statutory requirement. This includes:

- Documentation confirming your right to work in the UK – if you don't provide this, we may not be able to enter into a contract with you.
- The information regarding criminal convictions previously described, in such circumstances where we have stated that this is a statutory requirement.



Sharing your personal information with third parties

We may share your personal information with the following categories of third parties if this is required by law; necessary to enter into a contract with you, where there is another legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person. The following activities are carried out by third-party service providers:

- Health professionals and occupational health providers involved in your care, for the purposes of establishing whether you can undergo an assessment which forms part of the application process; and considering reasonable adjustments to the recruitment process for disabled applicants; establishing whether you will be able to carry out a function that is intrinsic to the particular work; establishing whether you are eligible for our guaranteed interview scheme for disabled applicants; and / or assessing your fitness to work if you have accepted an offer of work from us that is subject to health checks.
- Recruitment agencies assisting us in the administration of the recruitment process.
- Our professional advisors.
- Other third parties as necessary to comply with the law.

Automated decision-making

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

Transferring your personal information outside the EU

We do not intend to transfer your personal information to any country outside of the EU, or to any international organisation.

Data retention

If you don't start work with us following the recruitment process, we will retain your personal information for six months thereafter to allow us to establish, exercise or defend legal claims.

If you ask us to retain your personal information so that we can contact you to discuss future work opportunities, we will write to you separately, to obtain your consent to retain your personal information on this particular basis for a fixed period.

If you start work with us following the recruitment process, we will give you a copy of our Employee Privacy Notice and will retain your personal information as detailed in the Employee Privacy Notice.

Your rights

You have the following rights:



- **Access:** you can request a copy of your personal information that we hold in order to check we are processing it lawfully.
- **Correction:** you can ask us to correct your personal information if you don't think it is accurate, complete or up-to-date.
- **Deletion:** you can ask us to delete your personal information, if:
 - it is no longer necessary for the purposes for which we obtained it
 - you withdraw your consent, and we have no other legal basis for the processing
 - you validly object to the processing as described below
 - we have unlawfully processed the data
 - we must delete the data to comply with a legal obligation
- **Objection:** if we process your personal information to perform tasks carried out in the public interest or on the basis of legitimate interests, you can object to this processing on the basis of your particular situation. We will only then continue the processing if we have overriding legitimate grounds for this, or the processing is to establish, exercise or defend legal claims. You may also object if we process your personal information for direct marketing purposes.
- **Restriction:** you can ask us to restrict our processing of your personal information if
 - you have objected (as noted above) and are awaiting confirmation as to whether we have overriding legitimate grounds for processing
 - you contest the accuracy of the data (for a period that enables us to check it)
 - our processing is unlawful, but you don't want the data deleted
 - we no longer need the data, but you require it to establish, exercise or defend legal claims
- **Transfer:** if our processing is based on your consent or necessary to carry out our contract with you, and is carried out by automated means, you can request a copy of the personal information you have provided to us and the transfer of this to someone else. Where technically feasible, you can ask us to transfer it directly.
- **Complain to the Information Commissioner:** the Information Commissioner is the UK supervisory authority for data protection issues. We aim to resolve all complaints internally via our data protection officer who can be contacted at DPO@city-holdings.co.uk but you do have the right to complain to the Information Commissioner at any time.



Please contact our DPO if you require more information on these rights, or wish to exercise any of them.

Legal Information

- **City Facilities Management Holdings Limited**, a limited liability company (incorporation no: [SC199503]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management Holdings (UK) Limited**, a limited liability company (incorporation no: [SC148945]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management (UK) Limited**, a limited liability company (incorporation no: [SC092623]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management (Distribution) Limited**, a limited liability company (incorporation no: [SC372968]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management (NI) Limited**, a limited liability company (incorporation no: [NI065640]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Facilities Management Limited**, a limited liability company (incorporation no: [SC287679]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **CBES Limited**, a limited liability company (incorporation no: [SC288763]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **City Refrigeration (UK) Limited**, a limited liability company (incorporation no: [SC161511]) having its registered office at Caledonia House, 2 Lawmoor Street, Glasgow, G5 0US, Scotland, UK
- **Maintenance Management Limited**, a limited liability company (incorporation no: [SC04274143]) having its registered office at Apollo House, 6 Bramley Road Mount Farm, Milton Keynes, Bucks, MK1 1PT, England, UK