

MLL Recruitment Privacy Notice v1.0

Date: 18 May 2021

MLL Recruitment Privacy Notice v 1.0

Document Information

Document Name	MLL Document
Prepared By	Helen Taylor
Effective Date	29/04/2020
File Name	MLL – Recruitment Privacy Notice v 1.0
Document Owner	Helen Taylor

Updates

Version	Date	Updated By	Changes
0.1	01/05/2021	Helen Taylor	Document drafted
1.0	18/05/2021	Helen Taylor	Document Released

Distribution

Name	Position	Purpose
Helen Taylor	Director; People & Performance	Owner of Document
Website	Recruitment Applicants	To provide information on our Recruitment Privacy Notice

Table of Contents

1	Introduction	4
2	Definitions and Interpretation	4
3	Information about us	4
4	What does this policy cover?	5
5	Data Protection Principles	5
6	What are my Rights?.....	5
7	What data do we collect and how?	6
8	How do we use your personal data.....	7
9	How long will we keep your personal data?	8
10	How and where do we store or transfer your personal data?.....	8
11	Do we share your personal data?	8
12	How can I access my personal data?	9
13	How can you contact me?.....	9
14	Changes to this Privacy Notice	10

© MLL Telecom Limited 2021. This document is confidential to MLL Telecom, and use and disclosure by the recipient is restricted to internal use by the recipient. This document does not constitute a representation or warranty, and is not contractual unless specifically referenced in a written contract between MLL Telecom and the recipient.

1 Introduction

MLL Telecom understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our careers section of this website, www.mlltelecom.com and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Recruitment Privacy Policy carefully and ensure that you understand it. If you have any questions, please contact us using the contact details provided in this Notice.

2 Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

- **“ATS”** – the applicant tracking system which is used to process recruitment data and associated job application or enquiry.
- **“the Act”** – the Data Protection Act 2018 or any subsequent legislation
- **“Personal Data”** means any information relating to an identified or identifiable natural person. It may include contact details, other personal information, photographs, expression of opinion about you or indication to our intentions about you.
- **“Processing”** means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way
- **“Site”** this website www.mlltelecom.com

3 Information about us

Our Site is owned and operated by MLL Telecom. MLL Telecom Ltd registered in England under company number 02657917.

- Registered address: Jubilee House, Third Avenue, Globe Park, Marlow SL7 1EY.
- VAT number: 203 5584 28.
- Data Protection Officer: Helen Taylor.
- Email address: hr@mlltelecom.com
- Telephone number: 01628 495400.
- Postal address: MLL Telecom Ltd, Jubilee House, Third Avenue, Globe Park, Marlow SL7 1EY.

4 What does this policy cover?

This Privacy Policy applies only to the careers section of our Site and any automatic feed to our ATS. Our Site may contain links or feeds between other websites e.g Indeed, Glassdoor, LinkedIn or any other recruitment sites that we might choose to use to generate candidate applications.

Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

5 Data Protection Principles

When collected and processing your personal data we will comply with the data protection principles as outlined in the Act, which say that personal data must be:

- (a) Processed fairly, lawfully and in a transparent manner.
- (b) Processed for the specific purposes for which it was collected.
- (c) Adequate, relevant and not excessive for the purpose for which it was collected.
- (d) Accurate and up to date.
- (e) Not kept longer than necessary for the purpose for which it was collected.
- (f) Processed in a secure manner

6 What are my Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 13 to find out more.
- The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 13 to find out more.

- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to Us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves, so would ask that you contact us first, using the details in Part 13.

7 What data do we collect and how?

When you apply for a vacancy via any of our advertised methods, your data is input in our ATS.

- **Identity Data** – name, title, email address, contact numbers, Social Media URL, confirmation of right to work in the UK. If your Date of Birth is held on your CV this is also collected.
- **CV** – work history, education history, qualification
- **Proof of ID** - During the recruitment process we may also ask you to provide original proof of right to work in the UK.

8 How do we use your personal data

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The lawful basis on which we will be relying to process your personal data is “**legitimate interest**”. It is in the Company’s legitimate interests to obtain limited personal data about you to enable us to assess your application. Given the limited nature of the personal data we will collect and process we see there being no negative impact on your rights in obtaining and processing that data.

By submitting your application for a role, we will use this information and contact you by email, telephone or text regarding the role you have applied for.

As an applicant to the Company we will collect personal data relating to you to enable us to evaluate whether or not to proceed with your application and offer you a contract of employment or a contract for services (as applicable) with the Company.

As part of the application process, depending on the role for which you have applied/ service you intend to provide (as applicable) we may need to undertake certain searches relating to you, including but not limited to checks of your criminal records via the DBS. These searches may provide us with what is known as ‘sensitive personal data’, being personal data that relates to your ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, criminal proceedings or convictions. Where we need to undertake these searches we will let you know in advance what searches will be undertaken and the reason for them.

The lawful basis for this processing will be ‘legal obligation’. If we are undertaking these searches it is because the job you are applying for/service you intend to provide (as applicable) requires us to undertake them. You can object to us undertaking these searches, however, if you do object then it is likely that we will be unable to proceed with your application.

As outlined above, we will use your personal data to allow us to assess your suitability for the role for which you have applied/service you intend to provide (as applicable).

Should you be successful in your application then the personal data collected will then form part of your employment/contractor (as applicable) records and will be retained in accordance with your contract of employment/contract for services (as applicable) and in accordance with the Company’s Data Protection Policy, a copy of which is available upon request and would be shared with you along with any employment documents.

9 How long will we keep your personal data?

We will not keep your personal data for longer than is necessary for the purposes outlined above.

All personal data is retained in accordance with our Data Retention Policy, a copy of which is available upon request – but in relation to your application the below applies

Process/Activity	Data Retention Period	Reason	Responsibility
Job applications (CV's, application forms, proof of right to work, relevant qualification, covering letters and interview notes)	1 year from the date vacancy filled	Potential Discrimination	People Team

10 How and where do we store or transfer your personal data?

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we legally required to do so;

Your data is stored in the BambooHR data centre within the EU. You can read more about how and where we store or transfer your personal data in the [BambooHR Data Processing Agreement | BambooHR](#).

11 Do we share your personal data?

We will only provide your personal data to third parties where we are undertaking background searches against you. We will notify you of the identity of these third parties prior to undertaking the searches.

We will not share any of your personal data with any other third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law..

If we sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

12 How can I access my personal data?

If you want to know what personal data **we** have about you, you can ask **Us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of Our progress.

13 How can you contact me?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of People Director):

- Email address: hr@mllelcom.com
- Telephone number: 01628 495400.
- Postal Address: MLL Telecom, Jubilee House, Third Avenue, Globe Park, Marlow SL7 1EY.

14 Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated on **17 May 2021**

