

Recruitment Privacy Notice

Cadwyn Housing Association Limited ("Cadwyn", "we", "our", "us") is a Registered Society under the Co-operative and Community Benefit Societies Act 2014 Registered Number 18805R. Our registered address is 197 Newport Road, Cardiff, CF24 1AJ. We are a Registered Social Landlord regulated by the Welsh Government, registered number L019. Our ICO data protection registration number is Z6736414.

As part of the recruitment process, we collect and process your personal data strictly in accordance with the provisions of the United Kingdom General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA"). Personal information means any data from which you can be identified, either in a hard copy format or in electronic data. Cadwyn is a data controller, which means that we are responsible for deciding how we hold and use your personal information. This privacy policy covers job applicants from when you first apply for employment with us, until either your application has been rejected or you have decided to accept our unconditional offer of employment.

Stage 1: Initial Application, Assessment, and Job Interview(s)

The Legal Basis and Purpose for Collecting and Processing Your Personal Information

The legal basis for Cadwyn processing your personal information is article 6(1)(b) of the UK GDPR, where processing is necessary before entering into a (employment) contract. The purpose for processing your personal information is to assess your suitability for the role that you have applied for.

Personal Information That We Hold About You

We will collect sufficient (but not excessive) personal information; keep it up to date; store and destroy it securely when necessary; protect it from

loss, misuse, unauthorised access and disclosure;
and ensure that appropriate technical measures are in place. The personal information that we need to collect, store and use about you may include any of the following:

- your name
- your personal email address
- your home address and telephone number (optional)
- your right to work in the UK
- your relationships within Cadwyn
- your criminal convictions not spent
- notes we have taken from your telephone &/or face-to-face interview(s)

You have the option whether you wish to provide us with the following equal opportunities information:

- your ethnic origin
- your national identity
- your gender
- your gender identity
- your age range
- any disability you may have
- your sexual orientation
- your religion (or belief)
- your caring responsibilities
- your marital status
- your language skills

Stage 2: Offer of Employment

If you have been successful after the interview stage and we will send you with a conditional job offer of employment with us. Our offer will depend on the requirements of the job role that you have applied for. They may include any of the following:

Pre-employment Checks:

- proof of your identity
- proof of your qualifications
- criminal convictions and offences check

- credit checks
- previous employment
- personal references
- right to work in the UK
- health records and your fitness to work
- driving licence

If the pre-employment checks are satisfactory, we will send you an unconditional job offer with us, which is a legally binding contract of employment. At this stage we will require the following information:

Final Offer Information:

- your bank details
- your emergency contact details
- a recent photograph for identification purposes (if applicable to the role)
- your HMRC P45 or starter checklist information
- pension information (if you decide to join one of our schemes)
- death in service benefit nominee(s) (if you have joined one of our pension schemes)

How Long Do We Keep Your Personal Data?

If your application for employment is unsuccessful all your personal information will be retained for 6 months. After 6 months it will either be deleted or destroyed, unless we need to retain it to defend any legal claims.

If your application for employment is successful and you accept our offer of employment, your personal information will be retained in your personnel file throughout your employment with us. The periods for which your personal information will be retained are available in our Staff Privacy Policy - UK GDPR Article 5(1)(e)

The Legal Basis for Sharing and Storing Your Personal Information

Your personal data will be shared only when it is necessary and proportionate to do so or to comply with our legal obligations, including sharing it with [law enforcement authorities](#) for [law enforcement purposes](#) or our contractual obligations or where you have given us explicit

consent to do so - UK GDPR Article 6(1)(a) and Article 9(2)(a). We will not sell your personal data.

Our core Microsoft 365, Azure and People HR data is stored in locations in the UK or in the [European Economic Area](#) ("EEA") - UK GDPR Article 46.

Your Information Rights

The UK GDPR provides the following rights:

You have:

- the right to be informed about the use of your personal information - UK GDPR Articles 13 & 14
- the right to [access your personal information](#) - UK GDPR Article 15
- the right to amend your personal information (where it is incorrect) - UK GDPR Article 16
- the right to withdraw your consent (if given) at anytime - UK GDPR Article 7
- the right to complain (see **How You Can Complain** below) - UK GDPR Article 77

In certain circumstances you may also have:

- the right to be forgotten (also known as the right to erasure) - UK GDPR Article 17
- the right to restrict us processing your personal information - UK GDPR Article 18
- the right to data portability - UK GDPR Article 20
- the right to object to us using your personal information - UK GDPR Article 21
- the right to object to automated decision making and profiling - UK GDPR Article 22

If you wish to exercise your information rights, please contact Cadwyn Housing Association, 197 Newport Road, Cardiff CF24 1AJ, telephone 029 2049 8898, or email info@cadwyn.co.uk. Please note that the UK GDPR and the DPA provides some [exemptions](#) to your information rights - UK GDPR Article 23. Please note that the UK GDPR and the DPA provides some [exemptions](#) to your information rights.

How You Can Complain

If you are unhappy with the way that we have used your personal information, you have the right to complain. In the first instance, please email our Data Privacy Officer (dataprotection@cadwyn.co.uk). If you are unhappy with our final response, you may refer your complaint onto the ICO at Wycliffe House, Water Lane, Wilmslow SK9 5AF. Telephone number: 0303 123 1113. <https://ico.org.uk/>