

**Data controller: Chief Financial Officer**

**Data protection officer: Chief Financial Officer**

As part of any recruitment process, the Lloyds Bank Foundation for England and Wales (“The Foundation”) collects and processes personal data relating to job applicants. The Foundation is committed to being transparent about how it collects and uses that data and we will process your data according to the principles of the Data Protection Act 1998 (DPA) and, the EU General Data Protection Regulation (GDPR).

### **What information does the Foundation collect?**

The Foundation collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK

The Foundation collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The Foundation will also collect personal data about you from third parties, such as references supplied by former employers and information from employment background check providers. The Foundation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### **Why does the Foundation process personal data?**

The Foundation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Foundation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Foundation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows The Foundation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Foundation may also need to process data from job applicants to respond to and defend against legal claims.

Where the Foundation relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

The Foundation processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Foundation processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

The Foundation will not use your data for any purpose other than the recruitment exercise for which you have applied.

#### **Who has access to data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The Foundation will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Foundation will then share your data with former employers to obtain references for you and employment background check providers to obtain necessary background checks.

The Foundation will not transfer your data outside the European Economic Area (EEA) unless your previous employer, whom we require a reference from is based outside the EEA

#### **How does the Foundation protect data?**

The Foundation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. All data held during the recruitment process will be saved on a secure drive or locked in a cupboard.

#### **For how long does the Foundation keep data?**

If your application for employment is unsuccessful, the Foundation will hold your data on file for six months after the end of the relevant recruitment process. At the end of that period, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held are outlined in the Foundation's Data Retention policy.vb

## Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Foundation to change incorrect or incomplete data;
- require the Foundation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; In certain circumstances this may not be the case if the Foundation has a legitimate interest to continue to process your data
- object to the processing of your data where the Foundation is relying on its legitimate interests as the legal ground for processing; and
- ask the Foundation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact Chief Operating Officer.

If you believe that the Foundation has not complied with your data protection rights, you can follow the relevant internal complaint process as outlined in the Data Protection Policy.

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

## Automated decision-making

Recruitment processes are not based solely on automated decision-making.