

Data Privacy Notice for Employment Candidates

We are AGofC Limited with registered number 11922225 and address 37 – 41 Mortimer Street, W1T 5JH. Our Data Protection Lead can be contacted at HR@accoutergroup.com. We have produced this privacy notice in order to keep you informed of how we will handle your personal data as Data Controller. All handling of your personal data is done in compliance with the General Data Protection Regulation (EU) 2016/679 (“Data Protection Legislation”).

This notice will apply to any individual applying for a role within our business, either as an employee, contractor or worker (collectively referred to in this notice as “Candidates”).

As part of running the business, AGofC Ltd will need to process the personal data of Candidates. We recognise the importance of data protection principles and will always comply with Data Protection Legislation.

The terms “Personal Data”, “Personal Data Breach”, “Data Protection Officer”, “Data Controller”, “Data Processor”, “Data Subject” and “process” (in the context of usage of Personal Data) shall have the meanings given to them in the Data Protection Legislation. “Data Protection Lead” is the title given to the member of staff leading our data protection compliance programme in lieu of a requirement for a Data Protection Officer.

What are your rights?

When reading this notice, it might be helpful to understand that your rights arising under Data Protection Legislation include:

- The right to be informed of how your Personal Data is used (through this notice);
- The right to access any personal data held about you;
- The right to rectify any inaccurate or incomplete personal data held about you;
- The right to erasure where it cannot be justified that the information held satisfies any of the criteria outlined in this policy;
- The right to prevent processing for direct marketing purposes, scientific/historical research or in any such way that is likely to cause substantial damage to you or another, including through profile building; and
- The right to object to processing that results in decisions being made about you by automated processes and prevent those decisions being enacted.

Under certain circumstances, some of your rights might not be available, or be limited by legal requirements, our interests or the interests of others.

Where do we get your personal data?

A lot of the information that we collect about you is gathered through the application/recruitment process, either directly from you, or occasionally through an employment agency. During this process, we also sometimes collect additional information from third parties, such as former employers as referees, the Disclosure and Barring Service (DBS) and publicly accessible sources, such as LinkedIn.

What information about you do we collect?

We might collect, use, store and transfer different kinds of Personal Data about you which includes:

- the information found in your CV;
- the information included in your covering letter;

- the information you give us during interview; and
- information about criminal convictions.

How do we use the data we collect?

We use the data we collect about you to:

- assess skills, qualifications and suitability for the role;
- communicate with you about the recruitment process;
- keep records about our hiring process; and
- comply with legal and/or regulatory requirements.

It is within our legitimate interests to process your information in order to decide whether you offer you the role as it is beneficial to us to fill the role.

This processing will also help us determine whether we will enter into a contract with you.

Whether or not we collect or use certain data is determined by the recruitment process as follows:

1. We will receive your CV and covering letter. and use this information to decide if you will move on to the next stage.
2. You might be invited to complete a phone interview where we will gather additional information before deciding whether to shortlist you for interview.
3. If you are called for interview, we will use the information gathered at this stage to decide if we will offer you the role.
4. If you accept our offer, we will then conduct our final checks, such as gathering references and the DBS check, before confirming your appointment.

If you fail to provide any of the information noted above, at the times requested, we will not be able to make an adequate decision on your suitability for the role available, and unfortunately, will need to remove you from consideration.

How do we use 'Special Categories' of personal data?

- We use information you provide us about any disabilities in order to make reasonable adjustments during the recruitment process, as required.
- We collect information about past criminal convictions only if we would like to offer you the role and all other checks have been passed. We are entitled to carry out this check in order to make sure that you are suitable for a role with us. In particular:
 - The role of Installers requires a high degree of trust and integrity as Installers are given access to our client's homes or offices, and so we would like to ask you to seek a basic disclosure of your criminal records history.

We maintain appropriate safeguards, as required by law, when processing the data noted above.

What profiling or automated decision making does AGofC Ltd perform?

AGofC Ltd does not perform any profiling or automated decision making based on your personal data.

How long will your personal data be kept?

AGofC Ltd holds your details in relation to recruitment for a period of three (3) months after we have informed you of our final decision. We do this so that we can evidence our decision-making process in the event of any allegations of discrimination. Where applicable, we might also be required to hold records for longer periods in order to comply with a legal obligation.

Who else will receive your personal data?

AGofC Ltd passes your data to the third parties. A list of who they are be found in the section below, 'Third Party Interests'. We pass data to these third parties strictly for the purpose of helping us to process your application. Third parties are not permitted to use your data for their own purposes.

Does your data leave the EU?

Yes. Details can be found in the section below, 'Third Party Interests'.

Third Party Interests

Our Data Processors

Name or Category of Third Party Processor	Purposes for carrying out processing	If applicable – where does data leaving the EEA go and what safeguards are in place?
Information technology providers	<ul style="list-style-type: none"> • Cloud server systems to help us manage our business. • Telephony providers. • Office software providers, such as email clients. • IT Support services, who might require access to our systems (with our strict supervision) in order to remedy faults with our technology. 	<p>In the interests of providing a quality service, we use providers located in the United States. These providers are either Privacy Shield certified or bound by the contractual provisions of the EU Commissions model clauses.</p>

Who can you get in touch with?

If you'd like to discuss any of the points raised within this notice, please get in touch our Data Protection Lead at info@agofc.com

If you are not happy with how we have handled your Personal Data, in addition to sending us your complaints directly to HR@accoutergroup.com, you can send complaints to our supervisory authority. As AGofC Ltd predominantly handles the personal data of UK nationals, our supervisory authority is the Information Commissioner's Office. If you believe that we have failed in our compliance with data protection legislation, complaints to this authority can be made by visiting <https://ico.org.uk/concerns/>.