

F U T U R E

DATA PROTECTION PRIVACY NOTICE (RECRUITMENT)

Future Publishing Limited is committed to protecting the privacy and security of your personal information. This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process.

We are required to notify you of this information under data protection legislation, including the General Data Protection Regulation and the Data Protection Act. Please ensure you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

This policy applies to all candidates, including potential employees, workers, volunteers and contractors. This policy does not form any part of any contract of employment or contract for services. We may update this policy at any time.

Who collects the information

Future Publishing Limited ('Company') is a 'data controller' and gathers and uses certain information about you. This information may also be used by our affiliated entities and group companies (our 'group companies') and so, in this notice, references to 'we' or 'us' mean the Company and our group companies. Being a data controller means we are responsible for deciding how we hold and use personal information about you.

Data protection principles

We will comply with the data protection principles when gathering and using personal information. This means that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and kept securely.

About the information we collect and hold

What information

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection, these include racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, trade union membership, physical or mental health or condition, sex life and sexual orientation and generic data and biometric data.

We may collect the following information:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Your date of birth (but only if provided by you, as we do not collect this information during the recruitment process);
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Details of your referees;
- Any results of any test including psychometric tests, technical exercises, group exercises, written exercises or other skills test included in the recruitment process;
- CCTV footage of you;
- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers ;
- Information regarding your academic and (if applicable) professional qualifications ;
- For certain positions (we will notify you if this applies), information regarding your criminal record, in a criminal records certificate (CRC) or enhanced criminal records certificate (ECRC) ;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ;
- Information relating to your health, including any medical condition, health and sickness records or reasonable adjustments required for the application and interview process ;
- A copy of your passport or driving licence .

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked ‘’ above to us to enable us to verify your right to work and suitability for the position.

If you fail to provide information when requested, which is necessary for us to consider your application, we will not be able to process your application successfully.

How we collect the information

We may collect this information from you through the application and recruitment process, either directly or sometimes via an employment agency or job board, or from third parties including your referees (details of whom you will have provided), your former employers, your education provider, any relevant professional body, the Disclosure and Barring Service (DBS) or the Home Office.

How we will use information about you

We will only collect your personal information where we have a lawful basis for doing so under the General Data Protection Regulation, there are six lawful bases as follows:

- where you have given your consent;
- where it is necessary for the performance of a contract;
- to comply with a legal obligation;
- where processing your data is in your vital interests and we may be required to provide information to protect your life;
- for reasons of substantial public interest;
- where we have a legitimate interest to process your information, but only if these are not overridden by your interests, rights or freedoms.
- because it is necessary for carrying out obligations or exercising rights in employment law;

Some of the above grounds may overlap and there may be several grounds which justify our use of your personal information.

We may also use your personal information in the following rare situations:

- where we need to protect your interests (or someone else's interests). For example, if you became seriously unwell or had an accident during the recruitment process we may need to provide a hospital with personal information about you; or
- where it is needed in the public interest or for official purposes.

The situations in which we will process your personal information in accordance with the lawful bases set out above may include:

- making a decision about your recruitment or appointment;
- determining the terms on which you work for us;
- checking you are legally entitled to work in the UK;
- assessing qualifications for a particular job or task;
- dealing with legal disputes involving you;
- ascertaining your fitness or suitability to carry out the role;
- complying with health and safety obligations; and
- complying with any applicable safeguarding requirements.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

Sensitive personal information

Special categories of data, which are described above, require additional levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- in limited circumstances, with your explicit consent;
- where we need to carry out our legal obligations;
- where it is needed in the public interest, e.g. for equal opportunities monitoring;
- where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards; and
- where it is necessary for establishing, exercising or defending legal claims.

Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above.

We may transfer the personal information we collect about you outside of the EU. If possible, we will make sure one of the following safeguards is in place if we transfer your information outside of the EU:

- ensure there is an adequacy decision by the European Commission in respect of those countries in place; and/or
- ensure that your personal information receives an adequate level of protection and your information is treated by third parties in a way that is consistent with and which respects EU and UK laws on data protection by putting in place a Data Processing or Data Sharing Agreement.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for a period of up to twelve months but, in any event, for no longer than is necessary for the purposes for which it is processed, including for the purposes of satisfying any legal, accounting or reporting requirements. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do

so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is unsuccessful, we will keep your information for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests. In addition, if we have your permission we will keep your information on our files so that you can be considered for other vacancies. You can request us to remove your information from our talent pool at any time by contacting us at: recruitment@futurenet.com.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

Your right to object to us processing your information

Where our processing of your information is based solely on our legitimate interests (or those of a third party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact our Data Protection Officer (DPO), who can be contacted at DPO@futurenet.com, if you wish to object in this way.

Your rights to correct and access your information and to ask for it to be erased

Please contact our Data Protection Officer (DPO), who can be contacted at DPO@futurenet.com, if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our Data Protection Officer for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.