

**IMPULSE LEISURE**  
**APPLICANT PRIVACY NOTICE (JULY 2021)**  
**IN COMPLIANCE WITH**  
**GENERAL DATA PROTECTION REGULATIONS (GDPR)**

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As part of any recruitment process, Thurrock Community Leisure (Impulse Leisure) collects and processes personal data relating to job applicants. Impulse Leisure is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

**WHAT INFORMATION DOES IMPULSE LEISURE COLLECT?**

Impulse Leisure collects a range of information about you, including:-

- 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 (where applicable) benefit entitlements
- whether or not you have a disability for which Impulse Leisure needs to consider reasonable adjustments during the recruitment process, and
- information about your legal entitlement to work in the UK.

Impulse Leisure may collect this information in a variety of ways. For example, data might be contained in application forms, CVs and/or from recruitment agencies, obtained from your passport or other identity documents, or collected through interviews and/or other forms of assessments.

Impulse Leisure may also collect personal data about you from third parties, such as references we will request from former employers and/or education establishments (schools, colleges, universities), information from employment background check providers (where relevant) and information from criminal records checks (Disclosure and Barring Service). Impulse Leisure will seek information from third parties only once a conditional 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 (through the Applicant Tracking System (ATS)), in HR systems and on other IT systems (including email).

**WHY DOES IMPULSE LEISURE PROCESS PERSONAL DATA?**

Impulse Leisure needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you. In some cases, Impulse Leisure needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an applicant's eligibility to work in the UK before employment starts.

Impulse Leisure 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 Impulse Leisure to manage the recruitment process, assess and confirm a candidate's

suitability for employment and decide to whom to offer a job. Impulse Leisure may also need to process data from job applicants to respond to and defend against litigation.

Impulse Leisure may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. Impulse Leisure processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, Impulse Leisure is obliged to seek information about criminal convictions and offences. Where Impulse Leisure seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

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

### **WHO HAS ACCESS TO DATA?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment teams, interviewers (i.e. panel members) involved in the recruitment process, managers in the business area for which you may be considered and IT staff if access to the data is necessary for the performance of their roles.

Impulse Leisure will not share your data with third parties, unless your application for employment is successful and it makes you a conditional offer/offer of employment. Impulse Leisure will then share your data with former employers to obtain references for you, employment background check providers (if required) to obtain necessary background checks and if required, the Disclosure and Barring Service (which will require your express consent) to obtain necessary criminal records checks.

Impulse Leisure will not transfer your data outside the United Kingdom.

### **HOW DOES IMPULSE LEISURE PROTECT DATA?**

Impulse Leisure 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. Impulse Leisure employees involved in recruitment processes have been trained in data protection.

### **FOR HOW LONG DOES IMPULSE LEISURE KEEP DATA?**

If your application for employment is unsuccessful, Impulse Leisure will hold your data for 6 (six) months after the end of the relevant recruitment process. At the end of that period, your data is deleted and/or securely destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained throughout your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

### **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 Impulse Leisure to change incorrect or incomplete data
- require Impulse Leisure to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing, and
- object to the processing of your data where Impulse Leisure is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact the person responsible for data protection, details at the end of this document.

If you believe Impulse Leisure has not complied with your data protection rights, you can complain to the Information Commissioner. However, in the first instance please contact Impulse Leisure so that your concerns can be investigated in the first instance.

### **WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?**

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

### **AUTOMATED DECISION-MAKING**

Recruitment processes are not based solely on automated decision-making. However, Impulse Leisure's application tracking system (ATS) will ask candidates 'if they are legally entitled to work in the UK'. If a candidate ticks 'no'; then they will not be able to complete the rest of the application process. Any concerns relating to this question, should be directed to Lorna Mapson, Group Human Resources Manager – [recruitment@impulseleisure.co.uk](mailto:recruitment@impulseleisure.co.uk)

### **CONTACT DETAILS OF PERSON RESPONSIBLE FOR DATA PROTECTION**

[dataprotectionofficer@impulseleisure.co.uk](mailto:dataprotectionofficer@impulseleisure.co.uk)

Head Office, Blackshots Leisure Centre, Blackshots Lane, Grays, Essex, RM16 2JU