



Applicant Privacy Notice

Harbour as a recruiter is a data controller and collects and processes personal data and special category personal data relating to a job applicant to manage the recruitment process. We want to be transparent about how we collect and use your data and to meet our data protection obligations.

Who are we?

Harbour Homes (Scotland) Ltd, registered as: With the Financial Conduct Authority, registration FRN772734, a Scottish Charity (Scottish Charity Number SC027945), and having their Registered Office at: **108 Constitution Street, Leith, Edinburgh, EH6 6AZ**. We are notified as a Data Controller with the Information Commissioner's Office under registration number **Z5626639** and we are the data controller of any personal data that you provide to us.

Harbour Multi-Trades Ltd, registered with Company House (SC202640). We are notified as a Data Controller with the Information Commissioner's Office under registration number **ZA113265** and we are the data controller of any personal data that you provide to us.

Harbour's Data Protection Officer is appointed as RGDP LLP, info@rgdp.co.uk.

What personal information we collect and why is it processed?

We collect and process a range of information containing personal data about you. The table below details the personal data collected, the purpose for this and the legal basis for processing:

Personal Information	Purpose	Our legal basis
Recruitment records including: • CVs, interview notes and assessments • Proof of right to work in UK (such as copy of passports and visas) • Evidence of education and qualifications • References • Employment Contract • Induction records	To make a decision about your suitability for the role you applied for. To comply with legislative and regulatory requirements To allow contract, HR and business administration and defence against potential legal claims.	Contractual: it is necessary to take steps at your request prior to entering into a contract for employment. Necessary for compliance with a legal obligation. Necessary for our legitimate interests

CCTV and BWV Images	To maintain security of Harbour premises To provide a safe working environment for employees To comply with legislative and regulatory requirements	Necessary for compliance with a legal obligation Necessary for our legitimate interests
---------------------	--	---

Special category personal information	Purpose for processing	Our legal basis for processing	Special category legal basis
Equality opportunities monitoring	To monitor equality of opportunity and diversity in our recruitment process.	To deliver our legal obligations	To process data under explicit consent from you
Adjustments for disability/medical condition.	To make reasonable adjustments during the recruitment process.	To deliver what you need on the grounds of your consent	To ensure we have the necessary data in the event of defence of legal claims
Criminal records information.	To assess applicant suitability for the role.	To deliver our legal obligations	

We will collect this information in a variety of ways including directly from you, and from third parties as outlined below:

- Recruitment Agencies
- Former employers or other referees

Who we share your information with?

We will share your data as required by law to administer the working relationship that we have with you.

We may share your data with third parties, including third party service providers that process data on our behalf, in connection with the provision of occupational health services and IT services.

In relation to our third-party service providers, we have in place a written contract which only permits them to process your data for specified purposes and in accordance with our instructions. All their employees must be subject to a duty of confidentiality. The contract also requires third party service providers to take appropriate security measures in relation to your personal data which are in line with our policies. They are also not allowed to use your personal data for their own purposes.

How we secure your personal data?

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties.

In addition, we limit the access that individuals have to your personal data to those who have a business need to know.

We have in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a personal data breach when legally required to do so.

How long will we keep your personal data?

It is important that the personal data that we hold about you is accurate and current. Please keep us advised of any changes to the personal data that is held, particularly contact details for you and your emergency contacts throughout the course of your employment.

We will hold your personal data for the duration of your employment and for as long as is necessary to fulfil the purposes of satisfying any legal, accounting or reporting requirements that we are subject to. The periods for which your data is held after the end of employment are set out in our Retention Policy.

In determining the retention period, we will consider the amount, nature and sensitivity of the personal data and the potential risk of harm from unauthorised use or disclosure; the purpose for which the data is being processed; and whether we can achieve those purposes through other means; and the applicable legal requirements for holding that data.

Your Rights

You have several rights in relation to your personal data. These are listed below. A fee will not generally be charged for exercising any of these rights unless your requests are manifestly excessive.

- The right to access information about the personal data we process about you and to obtain a copy of it;
- The right to require us to change incorrect or incomplete data;
- The right to require us to erase or stop processing your data; and
- The right to object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing;

If you would like to exercise any of these rights, or if you have any concerns about how your personal data is being processed, please contact data@harbour.scot, or info@rgdp.co.uk.

If you still believe that we have not complied with your rights, you can complain to the Information Commissioner's Office. Contact details are available at <https://ico.org.uk/make-a-complaint/>

What if you do not provide personal data?

You have some obligations under your employment contract to provide us with information. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith which you have as an employee. You may also have to provide us with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the information to us may mean that you are unable to exercise these statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable us to enter a contract of employment with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Changes to this Privacy Notice

Harbour may update this privacy notice from time to time and will provide you with a new notice when making any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.