

HR Privacy Notices 2022

Privacy Notice for Applicants for Jobs

WHAT IS THE PURPOSE OF THIS DOCUMENT?

theidol.com is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you when you apply for a job at theidol.com, in accordance with our obligations under data protection legislation.

WHO ARE WE?

Investment Discounts On Line Limited is part of the Legal & General Group and some of your personal information is shared with them. Trading names of Investment Discounts On Line Limited also known as theidol.com include comparecover.com, annuityready.com, protectmypeople.com and Asanto.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you (please note this list is not exhaustive):

- The information you have provided to us in your curriculum vitae (CV) and covering letter.
- The information you have provided on our or your recruitment agency application form(s), including name, title, marital status, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and your bank or building society details.
- Any information you provide to us during an interview.
- If applicable, any information gathered during any psychometric testing or assessment process undertaken.
- If we decide to offer you a role:
 - details of your future role including future salary and working hours; and
 - any information collected whilst carrying out pre-employment screening. This includes copies of right to work documentation, references, and credit checks.

We may also collect, store, and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, and gender identity.
- Information about your health, including any medical condition or disability.
- Information about your socio-economic status.
- Information about criminal convictions and offences.

HOW WE COLLECT AND USE INFORMATION ABOUT YOU

How is your personal information collected?

We collect personal information about candidates from you, recruitment agencies, our background check provider, credit reference agencies, the Disclosure and Barring Service, your named referees, and data from publicly accessible sources.

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Monitor and develop action plans to address areas of under-representation to improve diversity and equal opportunities through our recruitment process and throughout employment.

It is in our legitimate interests to decide whether to appoint you to the role. We also need to process your personal information to decide whether to enter into a contract of employment with you.

The information provided in your CV and covering letter or your application form and the results from any testing undertaken will be processed to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information previously provided and the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and carry out any other necessary checks (including right to work checks, credit checks and criminal record checks if appropriate) before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use special categories of more sensitive personal information

We will use your special categories of more sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

- Where it is needed in the public interest for diversity, inclusion and equal opportunities monitoring, we will use information about your race or national or ethnic origin, religious beliefs, sexual orientation, and gender identity, disability or long-term health condition, social economic status, and caring responsibilities to ensure meaningful diversity monitoring and reporting.
- We may be aware of your sexual orientation (even if you don't specifically provide this) if you provide us with details of your marital status or your partner's details (for example, next of kin information).

Your information is stored in our and Legal & General's HR system and can only be accessed by a small number of people in our HR teams.

INFORMATION ABOUT YOUR CRIMINAL CONVICTIONS

As part of our pre-employment screening process, we undertake a criminal record check on all applicants who receive an offer of employment to satisfy ourselves (and in some instances, our regulator) that there is nothing in your criminal convictions history which makes you unsuitable for the role offered. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing criminal conviction data.

AUTOMATED DECISION-MAKING

In some instances, we may make decisions that are automated based on information provided during the recruitment process. For example, we may automatically reject applications which do not meet certain minimum criteria. We will do this where it is necessary in order to make a short list of possible candidates. If your application is rejected based on an automated decision, we will notify you of this fact.

DATA SHARING

Why might you share my personal information with third parties?

We may share your data with third parties, including other companies within the Legal & General Group and third-party service providers (including contractors and designated agents) where required by law, where it is necessary to process your application or where we have another legitimate interest in doing so.

We may also share your data with other third parties for the purpose of responding to external requests for information on the diversity of our business and in respect of our approach to equal opportunities. In this situation we will, so far as possible, share anonymised data only.

The following example activity may be carried out by third-party service providers: selection testing.

We may also share details on your future role (for example future salary and working hours) to parties where explicitly requested by you, for example for the purposes of mortgage applications or to letting agents. We require third parties to respect the security of your data and to treat it in accordance with the law. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

The personal information we have collected from you will be shared with Cifas (a not-for-profit fraud prevention membership organisation) who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected, you could be refused certain services or employment. Your personal information will also be used to verify your identity. Further details of how your information will be used by us and Cifas can be found in our full Fraud Prevention policy. Please email n.white@theidol.com if you want to receive a copy of this policy.

DATA SECURITY

We have put in place measures to protect your information, including appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. Details of these measures are available on request. In addition, we limit access to your personal information to those individuals, agents, contractors and other third parties who have a business need to know.

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

DATA RETENTION

How long will you use my information for?

If you are not appointed, we will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. In addition, we retain your personal information for that period so that we are able to contact you if a further opportunity arises which we may wish to consider you for. After this period, we will securely destroy your personal information in accordance with our data retention policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

If you are appointed to the role, we will retain your personal information in accordance with our Employee Privacy Notice which can be found on our internal intranet.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Nicola White, Office Manager (n.white@theidol.com) in writing.

DATA PROTECTION OFFICER

Legal & General Group have appointed a data protection officer (DPO) to oversee compliance with this privacy notice and we have appointed a data protection manager (DPM) to liaise with her. If you have any questions about this privacy notice or how we handle your personal information, please contact theidol.com:

Name: Mary Davis, datacontroller@theidol.com
Address: The Edge, Greenbank Road, Eden Business Park, Penrith, Cumbria, CA11 9FB

Should you need to contact Legal & General's DPO:

Email: Data.Protection@landg.com
Address: 1 Coleman Street, London, EC2R 5AA

You have the right to make a complaint at any time to the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues.

ICO address: First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow. SK9 5AF

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time.