

# Recruitment Privacy Policy

This notice is applicable to any personal information hereinafter referred to as “Applicant Information” which is given by candidates applying for a vacant post herein after referred to as “You” to Chiswick House School and St Martin’s College hereinafter referred to as “We” as part of a recruitment process for the position you have applied for. This Notice is devised to help you feel more confident about the privacy and security of your personal details during recruitment stage.

## Which personal data is collected?

Any information collected which is particularly unique to you, can shall be considered as Personal Data. To ensure fairness in the recruitment process, we will need to process such data for standard employment purposes. This ensures that your start with us is lawful and appropriate. Personal data gathered at recruitment stage are;

- Name, address and date of birth;
- Contact details such as mobile number and email address;
- Previous work history and experience including data on previous employers, current employment status, salaries, benefits and bonuses;
- Education background including professional qualifications and skills;
- Employer references;
- Nationality/Visa/work permit information (e.g. copies of Identity card and/or passport, National Insurance number.)
- Driving License,
- Police Conduct;
- For Educator roles in particular, any educational resources created during previous employment and/or during your studies;
- Interview assessment results.

## How is personal data collected?

Personal data required for recruitment purposes is provided by you via email/online applications through your Curriculum Vitae. At times, depending on the recruitment stratagem, information may be given to us via internal sources that act as referees or recruitment agencies. Public knowledge displayed by you through social media will not be taken into consideration unless consent has been granted by you.

## Why do we need to process your personal data?

The purpose of collecting and processing your personal data is to pursue our legitimate business interests and to process your interest in the posted vacancy. For us to continue on these premises, we will process your information to;

- Evaluate your suitability for the role applied for as specified in the job advert and job description;
- Conduct personal checks as permitted by law;
- Verify references and/or referee statements;
- Enable us to comply with current legislative requirements;
- Pursue the legitimate interests of the companies and protect our legal position in the event of legal proceedings. The company shall always ensure that your own interests, rights and freedoms are safeguarded.

The provision of your personal data is not a statutory requirement. It is a voluntary act, for the purpose of assessing and recruiting candidates suitable for the vacancies advertised by the company. Should such data be needed to be processed for anything that is not featured within this policy, we will advise you and request your consent.

## With whom do we share your personal data?

Since the collection of such personal data is purely for recruitment purposes, your personal data will be internally shared with the HR Department and the Senior Leadership Team that is involved in the recruitment process.

Your personal data may be disclosed to third parties on the basis of:

- The agreement between us and recruiting agencies with whom, the vacancy has been advertised;
- Court or tribunal cases and/or public bodies to whom disclosure is permissible by law or for the pursuing of the company's legitimate interest;
- Conducting background checks as per law requirements and when conducting previous employment background checks and attestations;

## What are your rights and how do we uphold them?

We are committed to safeguarding your personal data during the recruitment process. Additional to our safeguarding measures, we also respect the rights you have when it comes to processing your personal data. The rights you are privy to are:

- Requesting to correct your personal data: if at the time of sharing your CV, you realise that some shared information needs updating or correcting, you have the right (and duty) to contact HR

on [hr@smc.edu.mt](mailto:hr@smc.edu.mt) to correct your personal data. This can be done throughout the recruitment process. Rectification of academic records post interview will need to be with proof of certification.

- Objecting to the processing of your data: which means at any time of the recruitment process, you have the right to object and request to cease the processing of your personal data for recruitment purposes. This will imply that the recruitment process comes to an amicable termination and the interest to pursue the vacancy would no longer be in effect. However, in some cases, we may have legitimate grounds to continue processing your data which will continue even after objection. You may submit your objections to processing of your personal data on the grounds of the above-mentioned legitimate company interests by contacting our GDPR Coordinator. You may do so in writing by email on [markbusuttill@smc.edu.mt](mailto:markbusuttill@smc.edu.mt) or by ordinary mail at The GDPR Coordinator, St Martin's College., Triq Is- Swatar, L-Imsida MSD 2244.
- Restricting processing of your personal data: is done in events where you want us to establish the accuracy of the data, when our use of data is unlawful however you do not wish for us to delete it and when you need us to retain your data even when we no longer need it in order for you to establish, exercise or defend legal claims. This right will also be in effect when you have objected to the use of your data but we would still need to do so on legitimate grounds to using it. In case you wish for restriction, you may communicate so in writing by email on [markbusuttill@smc.edu.mt](mailto:markbusuttill@smc.edu.mt) or by ordinary mail at The GDPR Coordinator, St Martin's College., Triq Is- Swatar, L-Imsida MSD 2244.
- Erasing your personal data from our systems; before the time stipulated of retaining your data. This erasure can be done at any time of the recruitment process and will imply that the recruitment process comes to an amicable termination. Erasure of data may not be possible when the company is under legal obligation to retain it or when the retention of your information is necessary for us to defend ourselves in a legal dispute or to execute a legal title against you.
- Porting your data to our other companies; when you wish to apply for a vacancy in one of our other schools. You reserve the right to ask us to process your information for other vacancies that are of interest to you that are currently available in one of our other schools be it St Martin's College or Chiswick House School. Porting of data will only be done with your consent and will be done in a machine readable format.

## How long is the retention period of your personal data?

Once you have willingly submitted your data to be processed, it will be stored and processed in our systems for the whole duration of the recruitment cycle. Should you be successful in your interview, the company will then retain copies of the recruitment process within your employee folder and the retention period denoted in our Retention policy will apply.

If unsuccessful, personal data would be deleted and removed from our systems within thirty (30) days of announcement of recruitment choice. As a company, with your explicit consent, we will ask if we can still retain your data beyond the stipulated thirty (30) days in the event that another vacancy may arise that we would think would suit your skills better. Since all positions with us have a probationary period, retaining your data would mean that if the post you applied for has become vacant anew, then it would expedite the process of potentially filling in the role yourself.

We may change our recruitment privacy notice from time to time in accordance to changes in legislation. In the event that you wish for further clarifications on this notice or would like to make a request to avail yourself of your rights indicated afore, you may do so by contacting the company's GDPR Coordinator on [markbusuttill@smc.edu.mt](mailto:markbusuttill@smc.edu.mt). . You may also contact the Office of the Information and Data Protection Officer to refer any complaints you may have on [www.idpc.org.mt](http://www.idpc.org.mt).