

## **Data Privacy and the Recruitment Process**

Blackrock Credit Union Limited is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal data about you during and after the recruitment and selection process for a position with us. We will typically collect the following information:

- The information you have provided to us in your application form or curriculum vitae and covering letter;
- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Your tax Identification number;
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Any information you provide to us by email, telephone or during an interview;
- Details of your referees.

We will also collect the following information after the interview stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic or/and professional qualifications;
- Where applicable, for example in the context of fitness and probity checks for CF or PCF functions, we will seek to determine whether you have a criminal record and will seek to verify your financial soundness; we may also review information which you yourself have placed in the public domain;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;<sup>1</sup>
- A copy of your driving licence (If relevant to the position you are applying for);

Prior to the final stage of job offer, we may request you to undertake an employment medical assessment, which will involve lawful processing of data concerning your health.

### **Why we collect the information and how we use it**

We will typically collect and use this information for the following purposes:

- To assess your skills, qualifications, and suitability for the position
- To decide whether to employ you
- To make the checks and obtain the verification we are required by law to do, including fulfilling our obligations under the Fitness and Probity regime
- To communicate with you about the recruitment process
- To keep necessary business and HR records
- To keep records related to the hiring process in case you wish to exercise any rights relating to the data and to enable us to quickly and accurately resolve any disputes
- If we wish to retain your personal data on file for a fixed period on the basis that we may wish to consider you for a future opportunity, we will write to you separately, seeking your consent for this

In general, access to your personal data will be restricted to people in the credit union who need it in order to evaluate your application for employment, provide functions supporting our recruiting and selection team e.g. external recruiters or interviewers, or to whom we are compelled to provide it by applicable law.

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<sup>1</sup> Candidates are required to provide this information to enable us to verify your right to work and suitability for the position

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.

### **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 fully. 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.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, where this is required by law.

### **How secure is my information with third-party service providers?**

We may also need to share some of the above categories of personal data with other parties, such as recruiters, HR consultants, the Irish League of Credit Unions (ILCU)<sup>2</sup>, insurers and professional advisers. Usually, information will be anonymised, but this may not always be possible. All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes unless they are deemed to be data controllers in their own right<sup>3</sup>. We only permit them to process your personal data for specified purposes and in accordance with our instructions. The recipient of the information will also be bound by confidentiality obligations. We may also be required to share some personal data with our regulators, the Central Bank of Ireland as required to comply with the law.

### **Data Retention Periods**

We will retain your personal data for a period of 12 months after we have communicated to you our decision about whether to appoint you to the position. We retain your personal data 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. Once the retention period has expired, the respective data will be permanently deleted. If you require further information, please contact us.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. Information collected by us when employed by us is set out in our data protection privacy notice for Credit Union Personnel (which will be made available should you be successful).

### **In the event of any query**

Should you have any questions or concerns about the processing of your data in connection with our recruitment process, please contact our Data Protection Officer, at Blackrock Credit Union Limited, 1 Carysfort Avenue, Blackrock, Co Dublin, A94 W744.<sup>4</sup>

You have a right to complain to the Data Protection Commissioner (DPC) in respect of any processing of your data by:

Telephone +353 (0)1 765 0100 / 1800 437 737	Address: Data Protection Commission
E-mail <a href="mailto:dpo@dataprotection.ie">dpo@dataprotection.ie</a>	21 Fitzwilliam Square South
Web: <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a>	Dublin 2 D02 RD28

<sup>2</sup> The ILCU (a trade and representative body for credit unions provides professional and business support services such as HR to affiliated credit unions. We may disclose information in your application to authorised officers/employees of the ILCU for the purpose of its service provision to us

<sup>3</sup> As a data controller, the organisation will be required to have provided you with a separate privacy notice setting out what it does with its data.

<sup>4</sup> GDPR, Article 13 (1)(b)

You can find more detailed information on what personal data we process and how we process it in our main Privacy Notice on our website [www.blackrockcu.ie](http://www.blackrockcu.ie)