



Grimsby Town Football Club, and Grimsby Town Foundation

Candidate Privacy Notice

Version:	1 (Prepared by Wilkin Chapman and reviewed by Polly Bancroft 11/9/24)
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Candidate Privacy Notice

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

Grimsby Town Football Club and Grimsby Town Foundation are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:-

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

3. 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:-

- The information you have provided to us in your curriculum vitae and covering letter
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, and qualifications
- Any information you provide to us during an interview

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 political opinions.
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences

4. **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about candidates from the following sources:-

- You, the candidate
- Any recruitment agency you have engaged
- Our background check provider, from whom we collect information related to senior appointments
- Disclosure and Barring Service in respect of criminal convictions
- Your named referees, from whom we gather details such as previous employment dates, absences, and any additional information they may choose to disclose
- Public accessible sources, including information from public social media accounts

5. **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

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your application form we will then process that information 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 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 a criminal record check 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 may 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 may not be able to take your application further.

6. **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We will use your particularly 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.
- We will use information about your race or national or ethnic origin, religious,

philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

7. **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We envisage that we will process information about criminal conviction, where the nature of the role requires this.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. If you would like further information on this, please contact our Human Resources Department.

8. **AUTOMATED DECISION-MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

9. **DATA SHARING**

Why might you share my personal information with third parties?

We may need to share some of the above categories of personal data with other parties, such as HR consultants and professional advisers. Usually, data will be anonymised but this may not always be possible. The recipient of the data will be bound by confidentiality obligations. We may also be required to share some personal data [with our regulators or] as required to comply with the law.

10. **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

11. **DATA RETENTION**

How long will you use my information for?

We will retain your personal information for a period of six 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. After this period, we will securely destroy your personal information.

12. **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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.
- **Right to withdraw consent** in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

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 hr@gtfc.co.uk in writing.

Signed: *P. Bancroft*
Polly Bancroft, CEO

Dated: 11/09/2024

Signed: *Andrew Pettit*
Andrew Pettit (Co-Chair)

Dated: 11/09/2024

Candidate Privacy Notice Sept 2024

Final Audit Report

2024-09-11

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