



WATFORD FOOTBALL CLUB

GDPR DATA PROTECTION PRIVACY NOTICE (RECRUITMENT)

Data Protection Privacy Notice (Recruitment)

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

The Watford Association Football Club Limited trading as Watford FC ('Company') is a 'data controller' and gathers and uses certain information about you. This information is also used by our affiliated entities and group company, namely **Hornets Investment** (our 'group company') and so, in this notice, references to 'we' or 'us' mean the Company and our group company.

DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Contact details of DPO:

Name: Ian Pope

Email: DPO@watfordfc.com

Contact telephone number: 01923 496 000

Postal address: WFC Vicarage Road Stadium, Vicarage Road, Watford, Herts, WD18 0ER

Data protection principles (Data Protection Act 2018)

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.

AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, save for the exemptions to this rule i.e. if automated decision-making is required or authorised by law or is necessary for entering into or performing the contract or is based on your individual's explicit written consent.

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 Data Barring Service (DBS) or 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.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

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.

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 the DPO in writing.

About the information we collect and hold

The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

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.

Where information may be held

Information may be held at our offices and those of our group company, and third party agencies, service providers, representatives and agents as described above.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our data protection privacy notice (employment).

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

**THE SCHEDULE
ABOUT THE INFORMATION WE COLLECT AND HOLD**

**Part A
Up to and including the shortlisting stage**

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, CV, employment history including job titles, salary , notice period, and working hours and interests	From you, in the completed application form, CV and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details
Details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process legitimate interest: if you are unsuccessful in your application, your details may be passed on to an associated company to see if they have any suitable vacancies]	To see whether an associated company (the WFC Community Sports and Education Trust) has any suitable vacancies
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies For further information, see * below
Information regarding your criminal record	From you, in your completed application form	To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below

		regulated sector and protecting the public against dishonesty)	
Details of your referees and next of kin	From your completed application form	Legitimate interest: to carry out a fair recruitment process In the regulated sector, to comply with our legal obligations to obtain regulatory references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee
Details about your disability status and health	From your completed application form, medical questionnaire, interview, or from your directly	Legitimate interest: to carry out a fair recruitment process In the regulated sector, to comply with our legal obligations to make reasonable adjustments	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

Part B

Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/>	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs, DBS checks and enhanced criminal records certificates (ECRCs) <input type="checkbox"/>	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you For reasons of substantial public	To make an informed recruitment decision Information shared with DBS and other regulatory authorities as required For further

		interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence and relevant DVLA check and driving assessment comments <input type="checkbox"/>	From you	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving licence Information may be shared with our insurer

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences can be discussed with *the HR department*