

WHAT IS THE PURPOSE OF THIS DOCUMENT?

HelpAge International is committed to protecting the privacy and security of your personal information.

HelpAge is a “data controller” for some of your personal data. This means that we are responsible for deciding how we hold and use personal information about you.

This privacy notice describes how we collect and use personal information about you during and after your application for a role at HelpAge, in accordance with the General Data Protection Regulation (GDPR) and other relevant legislation.

It applies to all current and former applicants.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

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

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information through the application and recruitment process, either directly from candidates or sometimes from third-parties such as an employment agency, former employer, and background check agencies (such as the Disclosure and Barring Service).

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to process your application, or we may be prevented from complying with our legal obligations

AUTOMATED DECISION-MAKING

We do not use any automated decision-making (where an electronic system uses personal information to make a decision without human intervention).

Data Processing Schedule

Information we hold	How we will use it	When we will use it
<p>We will collect, store, and use the following categories of personal information about you:</p> <ul style="list-style-type: none"> • Personal contact details (including name, title, address, telephone/email address) • Personal information (including date of birth, gender) • Recruitment information (including copies of right to work documentation, skills and experience, references, qualifications and other information included as part of the application process) • Other (including CCTV footage, building access records) 	<p>We will use your personal information primarily to enable us to perform our role as a potential employer and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. We will only use your personal information when the law allows us to. Most commonly, we will process information for one of the following reasons:</p> <ol style="list-style-type: none"> 1. Where we need to comply with a legal obligation. 2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. <p>We may also use your personal information in the following situations, which are likely to be rare:</p> <ol style="list-style-type: none"> 1. Where we need to protect your interests (or someone else's interests). 2. Where it is needed in the public interest or for official purposes 	<p>The situations in which we will process your personal information are listed below:</p> <ul style="list-style-type: none"> • Recruitment and selection; including reference checks and administration • HR processes: including analysis of applicants' data, equal opportunities monitoring <p>Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.</p>
<p>We may also collect, store and use the following "special categories" of more sensitive personal information:</p> <ul style="list-style-type: none"> • Information about your race or ethnicity, 	<p>"Special categories" require higher levels of protection. We may process special categories of personal information for one of the following reasons:</p>	<p>We will use your particularly sensitive personal information in the following ways:</p> <ul style="list-style-type: none"> • We will use information about you for equal opportunity monitoring and reporting. The information

<p>religious beliefs, sexual orientation and disability</p> <ul style="list-style-type: none"> • Information about health and sickness records • Information about the outcome of criminal convictions and offences, and sanctions checks 	<ol style="list-style-type: none"> 1. In limited circumstances, with your explicit written consent; we would provide you with full details including the reason we need it, so that you can carefully consider whether you wish to consent. 2. Where we need to carry out our legal obligations and in line with our data protection policy 3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy 4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. <p>Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.</p>	<p>will be routinely anonymised.</p> <ul style="list-style-type: none"> • We envisage that we will collect information about criminal convictions. We will only collect information about criminal convictions if it is appropriate given the nature of the role and activity and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process with your consent or we may be notified of such information directly by you in the course. We will use information about criminal convictions and offences in the following ways as part of employment vetting procedures designed to safeguard the company, and all people who come into contact with our organisation and to meet our legal obligations.
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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. To withdraw your consent, please contact the Head of HR. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Change of purpose

We will only use your personal information 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DATA SHARING

We may share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

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.

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.

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. We may also need to share your personal information with a regulator or to otherwise comply with the law.

The following principal third-party service providers process personal information about you for the following purposes:

The Disclosure and Barring Service (UK) – Background checks
Former and current employees – Reference checks
Agencies – Recruitment services
Innovative Systems, FINSCAN – Sanctions checks

HelpAge International will always take up references, this can include criminal background checks, before making an unconditional offer of employment; and may do this at any stage of the recruitment process unless you specifically request otherwise.

DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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. Details of these measures may be obtained from the Head of HR. 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?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for six months from the closure of the campaign. Further details of retention periods for different aspects of your personal information are available from the Head of HR.

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.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

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.

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 Head of HR in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

DATA PROTECTION INFORMATION

If you have any questions about this privacy notice or how we handle your personal information, please contact the Head of HR or the Head of Operations. 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; or equivalent bodies in your jurisdiction.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal

information.