

Recruitment privacy notice



As part of any recruitment process, Aberlour collects and processes personal data relating to job applicants. Aberlour is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does Aberlour collect?

Aberlour collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, experience and employment history;
- information about your current level of remuneration;
- whether or not you have a disability in relation to the Guaranteed Interview Scheme and for which Aberlour needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

Aberlour collects this information in a variety of ways. For example, data might be contained in application forms, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Where you are successful at interview and become a preferred candidate, Aberlour will also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does Aberlour process personal data?

Aberlour needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, Aberlour needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

Aberlour has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows

Aberlour to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Aberlour may also need to process data from job applicants to respond to and defend against legal claims.

Aberlour processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where Aberlour processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

Aberlour is obliged to seek information about criminal convictions and offences. Where Aberlour seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Aberlour will keep your personal data on file for 12 months in case there are future employment opportunities for which you may wish to apply. Having such details still recorded could assist you to complete future applications much quicker. However, you can contact the HR department on jobs@aberlour.org.uk if you would prefer to have your application details deleted sooner.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR teams, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Aberlour will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Aberlour will then share your data with former employers to obtain references for you and Disclosure Scotland to obtain necessary criminal records checks.

Aberlour will not transfer your data outside the European Economic Area.

How does Aberlour protect data?

Aberlour takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does Aberlour keep data?

If your application for employment is unsuccessful, Aberlour will hold your electronic application on file for 12 months after the end of the relevant recruitment process, other data and copies of personal information taken at interview will be deleted 6 months after

the end of the relevant recruitment process. At the end of these periods your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Aberlour to change incorrect or incomplete data;
- require Aberlour to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Aberlour is relying on its legitimate interests as the legal ground for processing; and
- ask Aberlour to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Aberlour's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact Valerie Hogg, HR Manager on valerie.hogg@aberlour.org.uk. You can make a subject access request by completing Aberlour's form for making a subject access request.

If you believe that Aberlour has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Aberlour during the recruitment process. However, if you do not provide the information, Aberlour may not be able to process your application properly or at all.

Automated decision-making

Recruitment processes are not based on any automated decision-making.