Clyde Valley Group

Candidate Privacy Notice

(How we use your personal information)

This notice explains what information we collect from candidates, when we collect it and how we use it. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

1. Who are we?

Clyde Valley Housing Association Limited ("CVHA") is a Scottish Charity (Scottish Charity Number SC037244), a Registered Social Landlord and having their registered office at 50 Scott Street, Motherwell, ML1 1PN. We own or manage around 5,000 homes and support over 8,000 customers across Lanarkshire and East Dunbartonshire.

The personal data that CVHA holds about individuals may be processed by the different companies within its group. This includes Clyde Valley Group and Clyde Valley Property Services. However, the company that processes the data of an individual depends on the relationship that individual has with CVHA. The personal data of CVHA's tenants, colleagues and candidates is processed by Clyde Valley Housing Association Limited.

The data controller for the purposes of any personal data that you provide to CVHA will be the company that is processing that data, as detailed above. All of the above CVHA group companies are registered as data controllers with the Information Commissioner's Office.

We take the issue of information security and data protection very seriously. We are committed to ensuring that any processing of your personal data by us is in accordance with Data Protection Law. "**Data Protection Law**" includes the Data Protection Act 2018, the UK General Data Protection Regulation, the Data (Use and Access) Act 2025 and all other relevant data protection laws.

Our Data Protection Officer is our Senior Governance and Compliance Officer, Lisa Hughes. Any questions relating to this notice and our privacy practices should be sent to Lisa Hughes at **Corporate.services@cvha.org.uk**

2. How we collect information from you and what information we collect

We process your personal information to manage the recruitment process, take steps at your request before potentially entering into an employment contract, and comply with our legal and regulatory obligations.

This information includes:

- Name
- Address
- Telephone Number
- E-mail address
- Personal characteristics such as marital status, gender and ethnic group via anonymous and optional Equality Monitoring
- Details of your qualifications, skills, experience and work history including start and end dates with previous employers and workplaces
- Information about your remuneration, including entitlement to benefits such as pay, pension and holidays
- Information about your nationality and entitlement to work in the UK
- Employment References
- General correspondence relating to the recruitment process
- Information about any criminal convictions if this is relevant to the role you are applying to

3. Where we obtain your information

Most of the personal information we process during recruitment will be provided directly by you. We may also obtain information about you from other sources where this is relevant to the recruitment process. These may include:

- recruitment agencies or recruitment platforms, such as information included in your application or CV;
- referees, who may provide information about your employment history, experience and suitability for the role;
- disclosure or vetting bodies, where checks are required for the role;
- right-to-work checking services, where applicable; and
- publicly available professional information, where it is relevant and appropriate to the recruitment process.

We will only obtain and use information from third parties where it is necessary and appropriate for the recruitment process and in accordance with data protection legislation.

4. Why we need this information about you and how it will be used

We need to process the information we hold about you to manage the recruitment process, assess your suitability for the role, take steps towards entering into an employment contract where appropriate, and meet our legal and regulatory obligations.

For example, we are required:

- to obtain checks regarding your right to work in the UK
- to comply with health and safety laws
- to carry out regulatory and/or statutory checks in relation to your engagement with us

We are also required to process special categories of personal data, such as information about health or medical conditions which we are required to process in line

with our obligations under employment law (e.g., information pertaining to any disability you may have, or which may arise). Special category personal data is any data that reveals:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Political opinion
- Trade union membership
- Genetic or biometric data
- Data concerning health
- Data concerning sex life or sexual orientation

We use your personal information where this is necessary to take steps at your request before entering into an employment contract, to comply with our legal obligations and, where appropriate, for our legitimate interests in managing an effective and fair recruitment process. Where we process special-category information or criminal-conviction information, we will do so only where an additional condition under data protection law applies. Further details can be obtained from our Data Protection Officer.

5. Processing your information

We will:

- ensure that the legal basis for processing your personal data is identified in advance and that all processing complies with the law.
- not do anything with your data that you would not expect given our relationship with you.
- ensure that appropriate privacy policies are in place advising candidates and others how and why their data is being processed, and in particular advising data subjects of their rights.
- only collect and process the personal data that we need for purposes we have identified above.
- ensure that as far as possible the personal data we hold is accurate.
- only hold onto your personal data for as long as it is needed after which time we will securely erase or delete the personal data.
- ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely.

We will ensure that all colleagues who handle personal data on our behalf are aware of their responsibilities under our Data Protection Policy and other relevant data protection and information security policies. We will also ensure that our colleagues are adequately trained and supervised in the performance of their responsibilities.

6. Who we may share your information with

Your personal information will only be shared where necessary for the recruitment and selection process. This may include members of our People Team, recruiting managers and interview panel members who are involved in considering your application.

Where relevant to the role or stage of the recruitment process, we may also share information with organisations that support us with recruitment, including recruitment

agencies, occupational health providers, disclosure or vetting bodies, and providers of recruitment, assessment or HR systems.

We may also contact referees using the details you provide to obtain employment references.

We will only share the information necessary for the relevant purpose.

Your personal information will be stored securely. Where we use third-party providers to support our recruitment process, we will ensure that appropriate arrangements are in place to protect your information in accordance with data protection legislation.

7. Security

When you give us information, we take appropriate steps to keep your personal information secure. Recruitment records are held electronically and access is restricted to the People Team. Relevant information may be shared with recruiting managers and interview panel members where necessary for the recruitment and selection process. Please see our Data Protection Policy for further details on our security arrangements.

8. How long we will keep your information

We will retain the personal information of unsuccessful candidates for six months after the recruitment process has concluded. This allows us to respond to any questions or concerns about the recruitment process and to establish, exercise or defend any potential legal claims.

If you are successful, the relevant information collected during the recruitment process will be transferred to your colleague record and retained in accordance with our employee privacy notice and data retention requirements.

We will not retain your application for consideration for future vacancies. If you wish to apply for another role with us, you will need to submit a new application.

At the end of the relevant retention period, your information will be securely deleted or anonymised unless we are required by law to retain it for longer.

Data retention guidelines on the information we hold are provided in our Data Protection Policy.

9. Your rights

Under data protection law, you have a number of rights in relation to your personal information. Depending on the circumstances, these include:

- The right to be informed about how we collect and use your personal information.
- The right of access to the personal information we hold about you and to request a copy of it.
- The right to rectification if you believe that any personal information we hold about you is inaccurate or incomplete.
- The right to erasure to ask us to delete your personal information in certain circumstances.
- The right to restrict processing to ask us to limit how we use your personal information in certain circumstances.

- The right to object to our processing of your personal information in certain circumstances, including where we rely on legitimate interests.
- The right to data portability, where applicable, allowing you to obtain and reuse certain personal information you have provided to us.
- Rights relating to automated decision-making and profiling, where applicable.

Not all of these rights apply in every circumstance and some are subject to exemptions under data protection law. The Information Commissioner's Office confirms, for example, that erasure and restriction apply only in certain circumstances and that data portability has more limited application.

If you would like to exercise any of these rights as set out above, please contact us at cvha@cvha.org.uk. We will consider your request in line with Data Protection law.

10. The Information Commissioner's Office

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's Office can be contacted at:

Information Commissioner's Office (ICO) who regulates data protection across the UK:

6th floor
Quartermile One
15 Lauriston Place
Edinburgh
EH3 9EP.
Telephone Number: 0303 123 1115
Email: Scotland@ico.org.uk

11. Help us keep your information up to date

The accuracy of your information is important to us. Please help us keep our records updated by informing us of any changes to your personal and contact details.