

# RECRUITMENT AND SELECTION PRIVACY POLICY

## 1. Purpose

At Acorah Software Products Limited ('ASPL'), we are committed to protecting your privacy and this Recruitment and Selection Privacy Policy tells you how we collect, use and disclose your personal data in relation to our candidacy process for recruitment into the Company. This Recruitment and Selection Privacy Policy has been drafted to comply with the legal standards that currently exist in the United Kingdom and will be modified as ASPL determines is necessary to satisfy or exceed legal requirements.

We reserve the right to modify this Recruitment and Selection Privacy Policy at any time by notifying you, via email, of a new or revised Recruitment and Selection Privacy Policy.

If you would like further information on this Recruitment and Selection Privacy Policy or about ASPL's use of your personal data, we encourage you to contact us using the contact details in Section 7.2. For details concerning your rights under the General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA18) and other applicable legislation, contact the Information Commissioner's Office (ICO) (<https://ico.org.uk>).

## 2. Scope

This Recruitment and Selection Privacy Policy covers data management where ASPL qualifies as the Data Controller under the GDPR and the DPA18 (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/>), except where otherwise noted.

Where lawful bases of processing are noted (for example, contract, legal obligation or consent), ASPL in all ways manages individual rights in relation to these lawful bases in line with the ICO's guidance on the GDPR and the DPA18 (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-bases-for-processing/>).

ASPL may use certain third-party service providers to help us fulfil the candidacy process and maintain our business practices. In these instances, these third-party service providers are under a contractual duty to restrict their use of personal data to the limited purpose(s) specified by ASPL, which at all times shall be consistent with this Recruitment and Selection Privacy Policy.

## 3. Policy Statement

The Company is committed to protecting your privacy.

You have the right to lodge a complaint with the ICO as the supervisory authority if you have an issue in relation to our treatment of Your data.

This Recruitment and Selection Privacy Policy will remain in force for the duration of your candidacy process.

- In the case of a successful placement, this Recruitment and Selection Privacy Policy will be superseded by ASPL's internal policies.
- In the case of an unsuccessful candidacy, this Recruitment and Selection Privacy Policy will persist as described in Section 4 (with data retention as described in Section 4.5).

#### **4. Personal Data**

" Personal data" (as defined by the GDPR and the DPA18) means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

4.1. Personal data that can be used to identify you as an individual includes your:

- name
- mailing address
- telephone number
- education details
- employment history
- qualifications
- email address
- IP address.

4.2. In the course of the candidacy process, other personal data (for example your age, marital status or dependent's) are not requested by ASPL. However, should you share any other personal data with us through your CV or other communications, it will be retained in line with this Recruitment and Selection Privacy Policy.

Examples of non-personal data include:

- business name (when the business is a corporate entity)
- business entity type (e.g. LLP, Limited Company, etc.)
- website address
- non-personal information provided in communications with ASPL
- non-personal information about your computer and about your visits to and use of the TaxCalc website.

4.3. We may collect your personal data through a number of sources during the candidacy process, including:

- From you, the Candidate (via documents such as your CV, email, telephone or other medium);
- From third parties (such as recruitment or placing agencies);
- Automatically (such as your IP address should you use our website).

4.4. Personal data regarding your candidacy are centrally managed in a specific management system. These actions in regard to personal data are performed on the lawful basis of **legitimate interest** as described in the GDPR and the DPA18 and may be used by ASPL in the interests of the evaluation of your candidacy. This personal data is kept for the duration of your candidacy, and thereafter for a period of time as described in Section 4.5. Typical uses include:

- ensuring that you are properly registered to process your candidacy.
- updating you as to the status of your candidacy
- alerting you to important documents that should be reviewed or signed, normally via email or the management system (please note that it is not possible to opt out of these 'service level' communications without terminating the candidacy process itself).

4.5. ASPL will only retain a candidate's personal information for a reasonable time period once the recruitment process, they entered into has ended, unless explicit consent from the candidate is granted to hold their details on our system for an extended period (entering ASPL's Talent Pool of candidates).

The table below shows the maximum length of time a candidate's personal information will be held:

<b>Recruitment Stage</b>	<b>Maximum Amount of Time Before Personal Details are Deleted</b>
Candidate is rejected at application stage or withdraws from recruitment process	<b>60 days</b>
Candidate rejected at interview stage	<b>90 days</b> (independent candidates) <b>60 days</b> (agency candidates)
Candidate data held in ASPL's Talent Pool	<b>12 months</b> (only with candidate's explicit consent for ASPL to hold their details in our Talent Pool)

4.6. Unless otherwise specified in this Recruitment and Selection Privacy Policy, your personal data will not be transferred to a third party for their independent use without your express consent. ASPL

does not 'sell on' or share your personal details beyond the limited circumstances described within this policy.

4.7. You should be aware that there are very limited instances under law in which we may be required to disclose the personal data of our candidates. If such an instance arises, we shall only release that personal data as required by law. These actions in regard to personal data are performed on the lawful basis of legal obligation as described in the GDPR and the DPA18.

## **5. Telephone Calls, Emails and Other Communications To or From ASPL**

5.1. This section covers the personal data collection and usage that occurs when contacting or being contacted by ASPL in relation to your candidacy. During the course of your candidacy, pertinent notes will be kept on your management system file to record the process and resolution.

5.2. In the event that you contact us by telephone, calls may be recorded and/or live monitored to:

- help train ASPL staff;
- establish the facts in the event of a complaint, either by a candidate or a member of staff, and so assist in resolving it;
- assist in quality control to identify any issues in processes, with a view to improving them;
- ensure that we comply with relevant regulatory procedures;
- prevent or detect crime, and protect the interests of national security;
- investigate the unauthorised use of and secure the effective operation of our telecommunications system.

5.3. Certain personal data, such as names and contact details, may inevitably be recorded as a matter of course during telephone calls. These actions in regard to personal data are performed on the lawful basis of **legitimate interest** as described in the GDPR and the DPA18.

5.4. ASPL uses third party processors (Overline, TelcoSwitch) for its telephony and to store call recordings. These third party processors do not use any data for their own purposes; they are purely Data Processors as described in the [Overline](#) and [TelcoSwitch](#) Privacy Policies.

5.5. Please note that TelcoSwitch's telephony servers are located inside the United Kingdom (UK) and as such data gathered will remain within the UK as it is processed. All data is encrypted while in transit and at rest. Call recordings are kept for up to 60 days.

5.6. ASPL uses a third-party processor (PeopleHR) to implement its management system and manage the candidacy process. This third-party processor does not use any data stored for their own purposes; they are purely Data Processors as described in the [PeopleHR Privacy Policy](#).

5.7. Please note that PeopleHR's servers are located inside the European Economic Area (EEA) and as such data gathered will remain within the EEA as it is processed.

## **6. Protection of Personal Data**

6.1. All personal data is collected and stored in a secure manner and is used strictly in relation to this policy, any other applicable ASPL policies (such as the main customer [Privacy Policy](#), or Terms & Conditions of Sale, EULA and/or CSA for product purchases) and, where applicable, your stated privacy preferences.

6.2. For a full description of our data protection measures, please see our [Information Security Policy](#).

## **7. Recruitment and Selection Privacy Policy Questions, Updating Your Personal Data and Preference Notifications**

7.1. We encourage you to provide feedback on, and to ask questions about, this Recruitment and Selection Privacy Policy, as well as to review and update your personal data as maintained by ASPL.

7.2. Our ICO registration reference is Z896266X and our registered Data Protection Officer is Ian Belcher. The registered address is TaxCalc, Rubra One, Mulberry Business Park, Fishponds Road, Wokingham, RG41 2GY. Tel: 01189364855, Email: [compliance@taxcalc.com](mailto:compliance@taxcalc.com)

7.3. At any time you may change your preferences as to the use of your personal data. You may also as an individual request copies of the personal data held by ASPL, though some types of information may not be disclosed to individuals where exemptions under law apply (e.g. information relating to third parties in particular circumstances).

All such communications and inquiries should be sent to the contact details listed in Section 7.2. Please be sure to include sufficient information for us to verify your identity, locate your file (if applicable) and respond to your inquiry. You should also include your mailing address if you would like us to send you any written materials.

7.4. ASPL reserves the right to take reasonable steps to verify any requests for personal data it

receives.