



# ENTERPRISE RETIREMENT LIVING LIMITED

## Recruitment Privacy Notice

This Recruitment Privacy Notice explains what personal data 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 Recruitment 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 WE ARE

**Enterprise Retirement Living Limited** is a company incorporated and registered in England and Wales with company number 06525067 whose registered office address is Scutches Barn, 17 High Street, Whittlesford, Cambridge, CB22 4LT (“**ERL**”).

For the purposes of the Data Protection Act 2018 and any other applicable data protection and privacy laws and regulations (“**Data Protection Legislation**”), ERL will be the ‘data controller’ for all personal information that we determine the means and purpose of processing and therefore gathers and uses certain information about you. This information is also used by our affiliated entities and group companies (and so, in this Recruitment Privacy Notice, references to ‘we’ or ‘us’ mean the Company and our group companies).

ERL is registered with the Information Commissioner’s Office under registration number ZA187832.\*

*\* ERL comprises the companies that own ERL’s retirement villages (such that they are the respective villages’ landlords). However, as the relationship with the customers of those entities is with the same management and staff of ERL, and the provisions of this Policy are implemented and observed by the same people, we have not separately registered them with the Information Commissioner’s Office. The villages’ management companies are individually registered with the Information Commission’s Office and their registration numbers are available upon request.*

### DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information, as set out in our Privacy Policy at [www.erl.uk.com/privacy-policy/](http://www.erl.uk.com/privacy-policy/).

### 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, ie, 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 UK based servers and those of our group companies, 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 whether 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 we 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 / please request our Internal Privacy Policy.

Further details on our approach to information retention and destruction are available in our Privacy Policy at [www.erl.uk.com/privacy-policy/](http://www.erl.uk.com/privacy-policy/).

## YOUR RIGHT TO OBJECT TO US PROCESSING YOUR INFORMATION

Where our processing of your information is based solely on our legitimate interests (or those of a third-party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact [info@erl.uk.com](mailto:info@erl.uk.com) if you wish to object in this way. Our Data Protection Officer will reply where appropriate.

## YOUR RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED

Please contact [info@erl.uk.com](mailto:info@erl.uk.com) if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this Recruitment Privacy Notice. You also have the right to ask us for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. We will provide you with further information about the right to be forgotten, if you ask for it (and please see [www.erl.uk.com/privacy-policy/](http://www.erl.uk.com/privacy-policy/) for further details).

## 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

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information to those who have a genuine business need to know it. The individuals 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. Please see [www.erl.uk.com/privacy-policy/](http://www.erl.uk.com/privacy-policy/) for further details.

## **HOW CAN YOU MAKE A COMPLAINT?**

Please note that if you are not satisfied with the processing of your personal data as set out in this Recruitment Privacy Notice, please contact us at [info@erl.uk.com](mailto:info@erl.uk.com).

You have the right to issue a complaint directly with the Information Commissioner's Office, the data protection supervisory authority for England and Wales (<https://ico.org.uk/concerns/>) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

*This Policy was last updated April 2021.*

## Schedule

### 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, employment history (including job titles, salary and working hours) 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: 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
Your name, contact details and 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	To see whether an associated company has any suitable vacancies
Details of your referees	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

If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

**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 a criminal records certificate (CRC) or enhanced criminal records certificates (ECRC) as appropriate <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 interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required
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 obligations and exercise rights in employment law For reasons of substantial public	To carry out right to work checks Information may be shared with the Home Office

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		interest (preventing or detecting unlawful acts)	
A copy of your driving licence (if driving is part of the job role) <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
Information relating to your health <input type="checkbox"/>	From you and/or your medical practitioner <input type="checkbox"/>	To enter into/perform the employment contract To comply with our legal obligations Legitimate interests: to ensure you are fit to perform the duties For the purposes of obligations and rights in employment and social security law	To make an informed recruitment decision

If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

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.

If you accept an offer of employment or engagement from ERL then further information may need to be provided which is not addressed in the above tables. Such information will be governed by the ERL Privacy Notice for the Processing of Staff Personal Data.