

# RECRUITMENT PRIVACY NOTICE

## 1. Data Controllers and those responsible for Data Protection

A data controller is an organisation that collects and uses personal data and has responsibility for how the personal data is used and managed.

A nominated person is the person in an organisation who has responsibility for monitoring compliance with the law and for ensuring that personal data is protected within an organisation.

Yodel Delivery Network Limited is the Data Controller for those personal data provided by our Website Users, Candidates, Clients, Suppliers, and other people whom we may contact in order to find out more about our Candidates and that of our employees. Yodel Delivery Network Limited is registered in England, number: 05200072. Registered Office: Second Floor, Atlantic Pavilion, Albert Dock, Liverpool, Merseyside, L3 4AE. Yodel Delivery Network Limited's website is [www.yodel.co.uk](http://www.yodel.co.uk).

In the context of this privacy notice, when we use the term 'we' it means Yodel Delivery Network Limited.

The person Responsible for Data Protection for Yodel Delivery Network Limited can be contact on [data.protection@yodel.co.uk](mailto:data.protection@yodel.co.uk)

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

## 2. The information we may collect

The information about you we may collect, hold and process is set out below:

(A) Information collected and processed for finding you a suitable role is as follows:

- Your name
- Your address
- Your email address
- Your telephone number
- CV/work history
- Job preferences including role, geographical areas and salary
- Any other work related information you provide, for example, education or training certificates

(B) Information in respect to individuals that have worked for us previously or may work for us is as follows:

- Passport
- In some cases, permits and visas
- DOB
- National insurance number
- Full details of job offers and placements
- Outcome of criminal record checks and security clearance for certain roles
- In certain cases, medical information
- References
- Financial information (including but not limited to payroll details and terms, HMRC data, pension scheme details, court orders and statutory payments)
- A log of our communications with you by email and telephone

## 3. How we use your data

We use your personal data to help you find employment or other work roles that might be suitable for you within Yodel. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our recruitment service. Where appropriate and in accordance with local laws and

requirements, we may also use your personal data for things like marketing, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

We will use your personal data in the following ways:

- To match your skill sets with job vacancies to assist in finding you the positions that most suit you
- To put forward your details to hiring managers for you to be considered for vacancies
- To place you within our organisation
- To keep you informed of available opportunities as they arise
- To establish that you have the right to work
- To undertake relevant security and criminal record checks as required by our policies and as permitted by law
- To deal with any medical and health and safety issues relating to certain positions
- To put in place contractual arrangements and documentation once a role has been secured
- To pay you if placed

We will collect your personal data directly when you apply for any role, when you change any of your details or from you directly during the application or offer stages if you change any of your details or similar. We you to provide your personal data in order to perform our recruitment service and if you do not provide the personal data we request, we will be unable to fulfil this service.

## 4. Why We Need Your Personal Data

We need to process your personal data for a number of different reasons and these are our legal bases for processing. We also need to keep your personal data for as long as is necessary for us to operate our business and to comply with legal and regulatory obligations.

We rely on one or more of the following legal bases for processing personal data:

- **To perform our contract with you or to enter into a contract with you**

We need to process your personal data to fulfil our contract with you or to assess whether to enter into a contract with you, whether this is in determining your suitability for a role, employment or during the course of selection/interview/offer for a position within Yodel.

- **To fulfil our legitimate interests or the legitimate interests of a third party**

When we process personal data to fulfil our legitimate interests we will use it in a way in which you would reasonably expect and which will have a minimal privacy impact. When we or third parties are relying on legitimate interests we will balance our interests against your interests and the privacy impact of the processing on you and we will process your personal data responsibly.

Examples of our legitimate interests are: providing our service, preventing and investigating crime and indicating possible criminal acts as well as ensuring our IT security.

- **To comply with legal obligations to which our business is subject**

We have to comply with relevant law and regulation in order to provide our recruitment services and we will need to process your personal data in order to comply with these legal obligations.

- **Consent**

If we are relying on consent as our legal basis to process your personal data, you have the right to withdraw consent at any time. Our consent for our recruitment process is twofold:

- Consent for your data to be utilised for a specific role application.
- Consent for your data to be stored in a candidate pool so that we may be able to request you apply for future roles that become available.

We will keep your personal data for the purposes set out in this privacy notice and only for as long as any legal basis continues to apply. Below is a non-exhaustive list of some of the reasons we need to retain your personal data:

- Compliance with the requirements of Government Departments investigating crime, right to work or fraud.
- Ensuring we have relevant information in the event of any queries or complaints.

- Being able to identify if you have purchased a product which is subject to a product recall.
- To assist with the establishment, exercise or defence of legal claims.

The length of time we need to keep the personal data will vary depending on the nature of the personal data and the reason we are obliged to hold it. We will apply appropriate risk based measures to protect your personal data which may include pseudonymising or anonymising the personal data. If personal data is pseudonymised, this means it is de-identified so you are no longer identifiable, but we can re-identify you if we have a requirement to do so. If personal data is anonymised, it is de-identified, but can never be re-identified in the future.

### 5. Who We Transfer Data To

Transferring personal data to other organisations needs to take place with appropriate safeguards and you can be assured that we will only share the personal data that is needed for these organisations to be able to provide the right service to our Clients, you or to support us in doing so.

We may transfer your personal data to the following third parties:

- The originating Supplier through a MSP or RPO.
- Our chosen Third Party background and criminal check (DBS) partner to ensure we employ on those who we're legally able to.
- Technology service providers – our partners who provide IT and website services.
- Telephony providers – our partners who provide telephone services and functionality.
- Regulators and other governmental agencies or law enforcement agencies.
- Organisations who may be interested in purchasing our business or organisations who we may be interested in purchasing - we may sell parts of our business or acquire other businesses and your personal data may be shared with such third parties as part of this process.

We will only transfer your personal data to third parties who adhere to appropriate data security standards and controls. From time to time we may need to transfer your personal data to other countries. Where this is the case, we will ensure that the transfer is subject to appropriate safeguards to protect your personal data and complies with applicable law which may include having standard contractual clauses in place with the third party. For further information on how data can be transferred to other countries, please find enclosed a link to the European Commission website: [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

### 6. Your Rights

#### Right of Access

This is known as a Subject Access Request. If you want to know if we are processing personal data relating to you and to have access to any such personal data, you can email our Data Protection Team on [data.protection@yodel.co.uk](mailto:data.protection@yodel.co.uk).

#### Right to Rectification

If you believe that we hold inaccurate personal data about you, then you can contact our Client who requested our delivery services or you can email our Data Protection Team on [data.protection@yodel.co.uk](mailto:data.protection@yodel.co.uk). Depending on the type of personal data you believe is inaccurate, we may ask you for further proof to ensure that the personal data is being corrected properly. If we are satisfied that the personal data is inaccurate we will make the necessary changes. Please understand that records of applications may not be able to be altered given our mandate to comply with regulatory and law requirements and to ensure an accurate record of that particular application.

#### Right to Erasure

You have a right to ask for your personal data to be erased in certain circumstances. However, this right does not apply where we have to comply with a legal obligation or where we need personal data for the establishment, exercise or defence of legal claims. Therefore we cannot comply with an erasure request where you have been provided services for which we must keep records.

### Right to Restriction

You have a right to request that processing of personal data is restricted in certain circumstances. However, we shall still continue to process the personal data for storage purposes and for the establishment, exercise or defence of legal claims.

### Right to Object

Where we are relying on legitimate interests as a legal basis to process your data, you have a right to object to such processing on grounds relating to your particular situation.

You may also object to other processing when we rely on our legitimate interests as the basis for processing, but we do not have to stop the processing if we can demonstrate compelling legitimate grounds for the processing (taking into account our processing activities, the nature of our business and our legitimate interests) and that these grounds override your interests, rights and freedoms or in the event that we need the personal data for the establishment, exercise or defence of legal claims. To enable us to consider any objection we will need to know what specific interests, rights or freedoms relating to your particular situation you believe will potentially be put at risk by our processing. If we do stop processing your personal data, this may affect our ability to deliver our service to our Clients and you.

### Right to Portability

In certain circumstances, you can request that we provide to you your personal data in a commonly used format. If you wish to make such a request you can email our Data Protection Team on [data.protection@yodel.co.uk](mailto:data.protection@yodel.co.uk).

### Right to Complain to the Information Commissioner

You have the right to lodge a complaint with the Information Commissioner and more details can be found on their website [www.ico.org.uk](http://www.ico.org.uk).

## 7. How To Contact Us

If you have any queries about how we use your information or on data protection generally please send an email to [data.protection@yodel.co.uk](mailto:data.protection@yodel.co.uk) or write us at the Data Protection Team, Second Floor, Atlantic Pavilion, Albert Dock, Liverpool, Merseyside, L3 4AE.

## Glossary

**Candidates** – includes applicants for all roles advertised by Yodel, including permanent, part-time and temporary positions and contract roles with us; as well as people who have supplied a speculative CV to Yodel not in relation to a specific job. Individual contractors, freelance workers and employees of suppliers or other third parties put forward for roles with Yodel, Clients as part of an MSP offering or otherwise will be treated as candidates for the purposes of this Privacy Policy.

**Suppliers** – refers to partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to Yodel. In this context, suppliers that are individual contractors, freelance workers, or employees of suppliers will be treated as Candidates for data protection purposes. Please note that in this context, Yodel requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates) to their employees.

**Website Users** - any individual who accesses any of the Yodel and iGrasp websites.

**Staff** – includes employees and interns engaged directly in the business of Yodel (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to Yodel (even though they are not classed as employees). For these purposes, we also include employees of Yodel who are engaged to work on Clients' premises under the terms of RPO or MSP agreements. Likewise, independent contractors and consultants performing services for Yodel fall within the definition of a 'Supplier' for the purposes of this Privacy Policy.

**Managed Service Provider (MSP) programmes** – Yodel's outsourcing of the management of staff (including freelance workers, independent contractors and temporary employees) to an external recruitment provider.

**Recruitment Process Outsourcing (RPO) services** – full or partial outsourcing of the recruitment process for permanent employees to a recruitment provider.

**Other people whom Yodel may contact** – these may include Candidates' and Yodel Staff emergency contacts and referees. We will only contact them in appropriate circumstances.