



## **Prospective Employee Data Processing Notice (“Recruitment Data Processing Notice”)**

### **Data Controller:**

- Guernsey Post Limited

### **Address for all correspondence:**

Envoy House  
La Vrangue  
St Peter Port  
GUERNSEY  
GY1 1AA

### **Data Protection Officer:**

- Name: Stephen Sheridan
- Email: [dataprotection@guernseypost.com](mailto:dataprotection@guernseypost.com)
- Phone: 01481 733501

### **Introduction**

Guernsey Post Limited collects and processes personal data relating to prospective employees or contractors (“Prospective Employees”, “You”, “Your”) to assist them in deciding whether to employ them within Guernsey Post Limited on either a permanent or temporary basis.

Guernsey Post Limited is committed to being transparent about how it collects and uses personal data and to meeting its data protection obligations.

This Recruitment Data Processing Notice aims to provide further information to Prospective Employees about the way Guernsey Post Limited processes Prospective Employee’s personal data. Prospective Employees who are successful in their applications will be provided with a copy of our Internal Data Processing Notice, which explains the data processing of employees, directors and/or contractors personal data.

This Data Processing Notice applies to the recruitment process only. For information on how personal data is used by Guernsey Post Limited in any other scenario, please review our Privacy Notice – [Privacy Notice | Guernsey Post Ltd](#)

### **What information does Guernsey Post Limited collect?**

Guernsey Post Limited collects and processes a range of information about Prospective Employees. This can include:

- CV's and application forms provided to us either directly or through an agency when Prospective Employees apply for a role or contact us on a speculative basis. This CV could include, but is not limited to:
  - name / previous names
  - address
  - contact details, including email address and telephone number
  - date of birth
  - driving licence
  - details of education, qualifications, skills and experience
  - employment history, including start and end dates, with previous or current employers
  - any other personal data you or your agency acting on your behalf, choose to include in this document
  - information about your previous and desired remuneration, including entitlement to benefits such as pensions, parking or insurance cover.
  - reason for leaving current or previous role
  - nationality and entitlement to work in Guernsey (and if applicable the UK/EU)
  - information about your previous and desired remuneration, including entitlement to benefits such as pensions, parking or insurance cover
  - nationality and entitlement to work in Guernsey (and if applicable the UK/EU)
  - details of your availability for work, including the days of work and working hours and potential holiday entitlement
  - notes and scoring matrix for employment decision purposes
- If you voluntarily inform us of them, we might also keep a record of your sickness absence record and health conditions, including whether you have a disability for which Guernsey Post Limited needs to make reasonable adjustments
- If we offer you a role, we may also request information including but not limited to:
  - Passports /driving license
  - qualification certificates
  - bank account details
  - tax coding notices
  - social security numbers
  - reference information and/or information received from background or criminal records checks (where applicable and only if provided by the Prospective Employee), including information provided by third parties
  - data surrounding pre-employment medical
  - other information required as part of our onboarding process, please see Internal Data Processing Notice
- information relating to any previous applications you may have made to Guernsey Post Limited and/or any previous employment history with Guernsey Post Limited;

Guernsey Post Limited collects this information in a variety of ways. For example, data is collected through

- CVs or application forms provided by Prospective Employees or their agent
- From correspondence with Prospective Employees or

- Through interviews, meetings or other assessments. In some cases, Guernsey Post Limited collects personal data about Prospective Employees from third parties, such as references supplied by former employers and information from criminal records checks when provided by you.

Personal data is stored in a range of different places, including in

- Your personnel file (both paper and electronic) only applicable if the candidate becomes an employee;
- In Guernsey Post's HR management system, only applicable if the candidate becomes an employee; and
- In other IT systems including the email and OneDrive systems. Paper copies are held securely.

### **Why does Guernsey Post Limited process personal data?**

Guernsey Post Limited processes Prospective Employee's personal data to assess whether it should enter into an employment contract with them.

The processing of Prospective Employee's personal data throughout the recruitment process is necessary for and as a result of steps taken by the Prospective Employee aiming to entering into an employment contract or contracting relationship with Guernsey Post Limited.

Our legal basis for collecting personal data is legitimate interest, legal or regulatory and/or contractual.

Prospective Employee information will be used by Guernsey Post Limited for the purposes of carrying out its application and recruitment process, this includes, but is not limited to:

- check an employee's entitlement to work in Guernsey
- verifying information and carrying out reference checks and/or conducting background or criminal records checks (where applicable) if the Prospective Employee is offered a job
- Assessing the Prospective Employee's skills, qualifications and interests against Guernsey Post Limited's career opportunities
- Communicating with Prospective Employees about the recruitment process and/or your application(s), including, in appropriate cases, informing Prospective Employees of other potential career opportunities within Guernsey Post Limited
- Complying with applicable laws, regulations or other legal duties
- Effective general HR and business administration
- Respond to and defend against legal claims
- Maintain and promote equality in the workplace
- Ensure that potential employees are suitably qualified and able to carry out the work required

The collection of Special Category personal data is limited in the recruitment process and would usually only include information about health or medical conditions which would only be processed

to carry out employment law obligations such as those in relation to employees with disabilities and for health and safety purposes.

It could also include the request for the Prospective Employee to provide criminal records checks. This is personal data is provided to help the employee assess the fitness and propriety of the Prospective Employees.

#### **Who has access to personal data?**

Prospective Employee's information may be shared internally, including with Directors, HR (including external HR Consultants), the management /senior management team and the recruitment team, your potential direct reporting line manager and IT staff if access to the data is necessary for performance of their roles, data protection consultant.

Prospective Employee data may also be shared with Guernsey Post Limited's representatives in the context of collective consultation on a redundancy or business sale. This would be limited to the information needed for the purposes of consultation, such as your name and contact details. In those circumstances the data will be subject to confidentiality arrangements.

#### **How does Guernsey Post Limited protect data?**

Guernsey Post Limited takes the security of your data seriously. Guernsey Post Limited has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Details of these policies are available on request.

Where Guernsey Post Limited engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obligation for these parties to implement appropriate technical and organisational measures to ensure the security of data.

#### **For how long does Guernsey Post Limited keep Prospective Employee's personal data?**

Guernsey Post Limited will hold your personal data in accordance with its retention policy. This policy mandates that:

For unsuccessful candidates

- Guernsey Post Limited deletes all personal data collected within two weeks of completion of the recruitment process for those candidates not interviewed.
- Guernsey Post Limited deletes all personal data collected after three months of candidates who are interviewed but not offered a role.
- Prospective Employees should note that we operate an electronic cloud based operating and email system and as a result, it is possible that, although deleted, back-up copies may still be accessible for a period of time after the deletion of personal data.

For successful candidates

- The personal data will be transferred to our permanent HR files and then retained in accordance with Guernsey Post Limited's Employee Internal Data Processing Notice, a copy of which will be provided to Prospective Employees when offered employment.

#### **Your rights**

As a data subject, Prospective Employees have a number of rights:

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

If you would like to exercise any of these rights, please contact:

- Name: Stephen Sheridan
- Email: [dataprotection@guernseypost.com](mailto:dataprotection@guernseypost.com)
- Phone: 01481 733501

If you believe that Guernsey Post Limited has not complied with your data protection rights, you can complain to the Office of the Data Protection Authority directly.

### **Consent**

We do not ordinarily use consent for collecting information during the recruitment process however in the event that we do use consent you have the right to withdraw this consent at any time by the Data Protection Officer at the details above.

### **What if you do not provide personal data?**

Certain information, such as contact details, your right to work in Guernsey and payment details, have to be provided to enable Guernsey Post Limited to enter a contract of employment with you. If you do not provide other information, this will hinder Guernsey Post Limited's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

### **Automated decision-making**

Employment decisions are not based solely on automated decision-making.