Special EU Programmes Body
Comhlacht na gClár Speisialta AE
Special EU Skemes Boadie

THE SPECIAL EU PROGRAMMES BODY
PRIVACY NOTICE (RECRUITMENT)

The Special EU Programmes Body collects, holds and processes a considerable amount of information, including Personal Data about you as our (potential) employees or agency staff, to allow us to provide services and to deliver business objectives effectively and efficiently.

We respect your trust in us to use, store and share your information. In this notice we explain how we collect personal information about you, how we use it and how you can interact with us about it.

We recognise our responsibility in managing Personal Data and are committed to protecting and respecting your privacy through compliance with the Data Protection Act 2018, UK GDPR and the General Data Protection Regulation (GDPR (EU) 2016/679).

We will only use personal information you give to us for the purposes for which you provide it, or in accordance with the law, or for the prevention and detection of crime. We will only hold your Personal Data for as long as necessary for these purposes and will not pass it to any other parties unless this is made clear to you. All employees who have access to your personal data or who are associated with the handling of that data are obliged to respect the confidentiality of your personal information.

This Privacy Notice describes the types of Personal Data we collect, how we use it, with whom we share it, and the rights of and choices available to you as a data subject regarding our use of your information.

WHAT IS PERSONAL DATA?

Personal Data is data that relates to an identifiable living person ('data subject').

Special Categories Data (Sensitive Personal Data) also relates to an identifiable living person, but specifically addresses:

- Race or ethnicity
- Political opinions
- Religious or similar beliefs or other beliefs
- Physical or mental health
- Sexual orientation
- Trade Union Membership
- Biometrics (where used ID purposes)

MEETING OUR LEGAL AND REGULATORY OBLIGATIONS

To use your personal information lawfully, we rely on one or more of the following legal bases:

- Performance of a contract;
- Legal obligation;
- Protecting the vital interests of you or others;
- Public interest;
- Our legitimate interests;
- Your consent.

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checking and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us to keep it up to date, we may not be able to provide you with our services.

WHAT PERSONAL INFORMATION DOES SEUPB COLLECT AND HOW WE USE THIS INFORMATION?

SEUPB collects and processes Personal Data from various sources for a wide range of business purposes. All staff within SEUPB are obliged to treat any Personal Data collected or processed, in full compliance with the requirements of the Data Protection Act 2018, UK GDPR and GDPR (EU) 2016/679. The treatment of Personal Data is regularly addressed with staff through training and awareness briefings.

Human Resources

SEUPB needs to keep and process information about you for normal employment purposes. The information we hold, and process will be used for our management and administrative use only. We will keep and use it to enable us to run the organisation and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left our employment. This includes enabling us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Body and protect our legal position in the event of legal proceedings. If you do not provide the personal information, we may be unable in some circumstances to comply with our obligations, and we will tell you about the implications of that decision.

Recruitment and Selection

SEUPB collects and processes personal information about you throughout the recruitment and selection process, including job applications received through our website or e-mail, or in hard copy from you. We process this information as necessary to serve our recruitment activity. Any information requested will be used for recruitment purposes only, unless your application is successful when your personal information will be used for the purposes of performing an employment contract and will transfer to staff files.

To operate the Special EU Programmes Body recruitment system ("GetGot Jobs"), we will collect and store personal information you submit to us via our recruitment website.

The online recruitment system is provided and hosted by the Special EU Programmes Body and its third-party supplier. By submitting your personal information, you are consenting to the SEUPB holding and using it in accordance with this Privacy Notice.

When you visit www.seupb.eu/jobs , download an online application form or receive a hard copy application form to complete and submit, you may be asked to provide certain information yourself including name, contact details, date of birth and job history. Some of the information is mandatory for SEUPB to consider your application for a job vacancy or meet its statutory monitoring and reporting responsibilities. However, where indicated, some of the information is optional, and you can choose not to complete.

We may collect and process a wide range of Personal information about you at different stages of the recruitment process.

- We will collect and process contact information: your name; e-mail address; phone number(s); postal address We will also collect and process information contained in the application form, such as: education & qualifications; employment history; National Insurance Number; details of criminal offences; and details of any disability as defined in legislation.
- We will also collect data from you to meet our statutory obligations which will be anonymised for reporting purposes.
- If you attend an interview, we will collect and process additional personal information about you.
- Where relevant we will ask your consent to process Sensitive Personal Data. We collect and process sensitive information as necessary, in compliance with all applicable legislation, and in the furtherance of an employment contract. Where consent is sought and given, you retain the right to withdraw consent to the processing of Sensitive Personal Data.
- We will collect references which will contain personal information about you but only from referees provided by you and only when we are considering offering you a job in the Body.
- If you have not completed your application by the end of a recruitment campaign, we may use your contact details to invite you to complete an optional survey about your reasons for not completing it and how we can improve the application process. You may receive an invitation for each separate campaign in which you leave an application incomplete. Responses are anonymous, and we cannot determine whether you have responded. Any email lists created specifically to send survey invitations will be securely destroyed as soon as all invitations for that recruitment campaign have been sent.

If you make an application through the online recruitment system the personal information you provide as part of the recruitment and selection process will only be held and processed for the purpose of the selection processes of SEUPB and in connection with any subsequent

employment or placement, unless otherwise indicated. Your personal information will be retained for as long as is permitted by legislation and then destroyed.

The information you provide to us will be held on third party supplier computers in the UK who act for us for the purposes set out in this privacy notice. They may provide support services to SEUPB or on behalf of SEUPB. Except as set out in this privacy notice or as required by law, your personal information will not be provided to any third party without your prior consent.

By submitting your personal information and/or application you:

(1) declare that you have read, understood and accepted the statements set out in this data protection privacy notice;
(2) are declaring that the information given in the application is complete and true to the best of your knowledge, and understand that deliberate omissions and incorrect statements could lead to your application being rejected or to your dismissal;
(3) are giving your consent to the processing of the personal information contained in the application and any other personal data you may provide separately in a manner and to the extent described; and
(4) are authorising SEUPB to verify or have verified on their behalf all statements contained in the application and to make necessary reference checks.

Unsuccessful applicant data will be held within the recruitment system for a period of one year before being deleted in order that you can access and re-use data in future applications and we can respond to statutory reporting requests. Successful applicant data not transferred to an employee file will be deleted after a period of seven years.

HOW YOUR INFORMATION WILL BE HANDLED

In deciding what personal information to collect, hold and process, SEUPB is committed to ensuring that we uphold the highest standards. We adopt and maintain the high standards in respect of the handling and use of your personal information and only collect, hold and use your personal information where it is necessary and proportionate to do so. We will keep your personal information secure and safe, ensuring that there are effective safeguards and systems in place to make sure your personal information is kept secure and that any personal information is deleted when it is no longer needed.

As a Body we will consider and address the privacy risks when planning to use or hold your Personal Data in new ways, such as when introducing new systems. We will provide regular training to staff who handle personal information and we will comply with obligations to report any failure in our systems which results in a Data Breach and information being lost or miscommunicated.

HOW WE KEEP YOUR INFORMATION SAFE (WHERE YOUR PERSONAL DATA IS STORED)

We protect your personal information with security measures under the laws that apply. We keep our computers, files and buildings secure.

Your personal information will be stored on data storage systems, in spreadsheets, and/or in hard copy within a manual filing system, which is accessible only by nominated SEUPB staff in each work area. Access to Sensitive Personal Data will be further limited to relevant staff only. We store your data on secure servers in the European Economic Area and/or the United Kingdom. Personal data is not normally stored on laptops. However, where data is stored all SEUPB laptops are encrypted for security purposes.

HOW LONG WE HOLD YOUR PERSONAL DATA

To meet our legal and regulatory obligations, we hold your personal information for a period of time, but we do not hold it for longer than is necessary.

DATA PROTECTION OFFICER

Our Data Protection Officer (DPO) oversees how we collect, use, share and protect your personal information to ensure your rights are fulfilled.

YOUR PERSONAL INFORMATION RIGHTS

The General Data Protection Regulations offers data subjects specific rights in relation to the collection and processing of their Personal Data. We can help you with:

- *Accessing Your Personal Information*: You can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information.
- *Updating and Correcting Your Personal Information:* You can ask us to update or correct personal information we hold about you that is inaccurate or incomplete.
- *Removing Your Consent (your right to Object):* You can change your mind wherever you give us your consent, such as direct communications or marketing, or using your sensitive information, such as medical data.
- *Restricting and Objecting:* You may have the right to restrict or object to us using your personal information if for example you consider the data is inaccurate or that the processing is unlawful.
- *Deleting Your Information (your right to be forgotten):* You may ask us to delete or destroy your personal information. In some cases, SEUPB will retain information where it is required for lawful purposes.
- *Moving Your Information (your right to portability):* Where possible we can share a digital copy of your personal information directly with you or another organisation.

Should you seek to exercise any of these rights, you should contact:

Data Protection Officer
Special EU Programmes Body
7th Floor
The Clarence West Building
2 Clarence Street West
Belfast BT2 7GP

Email: dataprotection@seupb.eu
Tel: 028 9026 6660

SHARING YOUR PERSONAL DATA

Access to your personal information is normally only provided to relevant staff in SEUPB. Any sharing of information regarding applicants for SEUPB vacancies, for example with the Equality Commission of Northern Ireland, is anonymised. It would only be when an applicant is successful and becomes and employee of SEUPB that, where necessary we may pass your Personal Data to third parties who perform functions on our behalf and who also

provide services to us, for example, our Pension Administrator, or people providing contracted services to/for us. These parties are required to comply with the provisions of GDPR and adhere to the conditions set out in this Privacy Notice.

As a public authority, controller and cross-border body, we receive information requests under the North South Implementation Bodies and Tourism Ireland Ltd Freedom of Information Code of Practice, and the EU and UK GDPR. Requests are considered on a case-by-case basis, and we will only disclose your information where we are legally required to do so.

We may also release personal information to regulatory or law enforcement agencies, if they require us to do so and we will also disclose your information where we are permitted and requested to do so by law.

SEUPB will not sell or share your personal information for marketing purposes.

We will not transfer your personal information outside of the European Economic Area and/or the United Kingdom.

ACCESSING AND UPDATING YOUR PERSONAL DATA

You are entitled to access the personal information we hold about you. This request known as a Subject Access Request will be processed and information provided to you within one month of receiving your request. If you wish to do this, please contact:

Data Protection Officer
Special EU Programmes Body
7th Floor
The Clarence West Building
2 Clarence Street West
Belfast BT2 7GP

Email: dataprotection@seupb.eu
Tel: 028 9026 6660

MAKING A COMPLAINT

If you have any concerns or complaints regarding the way we process your personal data, please contact us at dataprotection@seupb.eu at first instance.
We will acknowledge receipt of your complaint within 30 days and will take appropriate steps, to investigate and respond to the issues raised. We will keep you informed of progress where appropriate and will provide you with the outcome of your complaint in line with the SEUPB complaints policy.

If you wish to make a complaint you may do so in person, by telephone, in writing and by e-mail by contacting:

Complaints Officer
Special EU Programmes Body
7th Floor
The Clarence West Building
2 Clarence Street West
Belfast BT2 7GP

Email: dataprotection@seupb.eu
Tel: 028 9026 6660

Please be assured that all complaints received will be fully investigated. We ask that you supply as much information as possible to help us resolve your complaint quickly.

If you are dissatisfied with our response, then you have the right to lodge a complaint with the Data Protection Commissioner or the Information Commissioner using the details below.

The Data Protection Commissioner can be contacted at: -
Office of the Data Protection Commissioner
Canal House
Station Road
Portarlington
Co. Laois
R32 AP23
Ireland
www.dataprotection.ie

The Information Commissioner can be contacted at: -
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

UPDATES TO THIS NOTICE

We will make changes to this Privacy Notice from time to time, particularly when we change how we use your personal information or change our technology.

You can always find an up-to-date version of this notice on our website at www.seupb.eu or you can ask us for a copy.