



Recruitment Privacy Notice

Effective from 25th May 2018

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1. HOW WE USE YOUR PERSONAL INFORMATION

When you are applying for a job, or expressing an interest in working for the Vernon Building Society, it will hold information about you, or from which you can be identified. This information includes what you tell us about you and what we learn about you during the recruitment process.

The Vernon Building Society is the 'Data Controller' for the information it collects about you. The information will be used to assess your skills, qualifications and suitability for the role, and with your consent to carry out background & reference checks.

This notice also tells you about your privacy rights and how the law protects you.

2. PERSONAL INFORMATION AND THE LAW

Contacting us

You can contact us about anything in this Privacy Notice. If you have any queries or want more details about how we use your personal information, you can ask us by:-

Emailing: risk@thevernon.co.uk;

Writing to:- Data Protection Officer, Vernon Building Society, 19 St Petersgate, Stockport, SK1 1HF.

Telephoning: 0161 429 6262 (between 8.45am - 5.00pm Mon to Fri)
Calls may be monitored or recorded

3. HOW THE LAW PROTECTS YOU

This section tells you the legal reasons we rely on for each of the ways your personal information is used. Your privacy is protected by law, this section also tells you how that works.

Data Protection law says that we're allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside the Vernon Building Society. The law says that we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it's our legal duty, or
- When it's in our legitimate interest, or
- When you consent to it.

When we have a business or commercial reason of our own to use your information, this is called a 'legitimate interest'. We will tell you what that is, if we are going to rely on it as the reason for using your data. Even then, it must not unfairly go against your interests.

The law and other regulations treat some types of sensitive personal information as 'Special'. This includes information about racial or ethnic origin, sexual orientation, religious beliefs, trade union membership, health data and criminal records. We will only collect Special Categories of personal data where needed to fulfil our HR obligations.

At present the only Special Categories we collect relate to ethnic origin and health. We will not collect or use any other types of data without your explicit consent unless the law allows us to do so. If we do, it will only be when it's necessary, such as:-

- For employment purposes;
- For reasons of substantial public interest;
- For the detection and prevention of fraud & crime; or
- To establish, exercise or defend legal claims.

If you choose to disclose information to us in relation to any special requirements needed to enable you to attend an interview, we will only use this information for this purpose.

4. HOW WE USE YOUR PERSONAL INFORMATION

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

Managing the recruitment process (including assessing your suitability)		
What we use your personal information for	Our reasons	Our legitimate interests
To assess skills, qualifications and experience	<ul style="list-style-type: none"> • Fulfilling contracts • Legal obligation 	Not applicable
To obtain references including from previous employers	<ul style="list-style-type: none"> • Your consent • Legitimate Interests 	<ul style="list-style-type: none"> • It's reasonable to expect that the Society will obtain references for successful applicants as part of the recruitment process. The Society will also provide references where a staff member has asked that the Society do so.
To communicate with you about the progress of your application	<ul style="list-style-type: none"> • Your consent 	Not applicable
To verify your identity	<ul style="list-style-type: none"> • Legal obligation 	Not applicable
To verify your eligibility to work in the UK	<ul style="list-style-type: none"> • Legal obligation 	Not applicable

Managing security, risk and crime prevention		
What we use your personal information for	Our reasons	Our legitimate interests
To manage risk for us and our customers	<ul style="list-style-type: none"> • Our legal duty 	<ul style="list-style-type: none"> • Complying with rules and guidance from regulators

Managing security, risk and crime prevention (Cont'd)		
What we use your personal information for	Our reasons	Our legitimate interests
To process Credit Search and Disclosure Barring Search (DBS) or Disclosure Scotland checks upon successful application and during employment.	<ul style="list-style-type: none"> Your consent Legitimate interest 	<ul style="list-style-type: none"> Complying with rules and guidance from regulators, the Society has a clear legitimate business interest together with actual consent from the employee.

For processing special categories of personal data	
What we use your personal information for	Our reasons
Substantial public interest	<ul style="list-style-type: none"> Using criminal records data to help prevent, detect, and prosecute unlawful acts and fraudulent behaviour; and Using criminal and health information as needed to provide insurance products.
Responding to regulatory requirements	<ul style="list-style-type: none"> Showing whether we have assessed your situation in the right way; and Passing information to the regulator as needed to allow investigation into whether we have acted in the right way.
Legal Claims	<ul style="list-style-type: none"> Using any special categories of data as needed to establish, exercise or defend legal claims.
Consent	<ul style="list-style-type: none"> Telling you that we need your consent to process special categories of personal data, when that is what we rely on for doing so.

All jobs offered by the Vernon Building Society require a high degree of trust and integrity, therefore we undertake a criminal record check to satisfy ourselves that there is nothing in your history that would make you unsuitable for being employed by the Society. This information will only be obtained at the point we conditionally offer you a job and your explicit consent will be sought at the time this information is needed. We have in place an appropriate policy and safeguards that we are required to maintain by law when we collect this information.

Types of Personal Information

This explains what all of the different types of personal information mean that are covered by Data Protection Law.

Type of personal information	Description
Financial	Your financial position, status and history
Contact	Your name, where you live and how to contact you
Socio-Demographic	This includes details about your work or profession, nationality, education, and where you fit into general social or income groups.

Type of personal information	Description
Transactional	Details about payments to and from your accounts with us, and insurance claims you make.
Contractual	Details about the products or services we provide to you.
Behavioural	Details about how you use products and services from us.
Communications	What we learn about you from letters and emails you write to us and conversations between us.
Open Data & Public Records	Details about you that are in the public records, such as the Electoral Register, and information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, driving license, birth certificate or utility bill.
Special Types of Data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do:</p> <ul style="list-style-type: none"> • Racial or ethnic origin; • Religious, political or philosophical beliefs; • Trade union membership; • Genetic and biometric data; • Health data; • Lifestyle information including data related to sex life or sexual orientation; • Criminal records of convictions and offences; and • Allegations of criminal offences. • Age, gender & marital status. <p>You can read how we may use special types of data in “How the law protects you”.</p>
Consents	Any permissions, consents or preferences that you give us. This includes things like for processing special categories of data.
National Identifier	A number or code given to you by a government to identify who you are, this could be a National Insurance number or Social Security number or Tax Identification Number (TIN).

5. WHERE WE COLLECT PERSONAL INFORMATION FROM

This section lists all the places where we get data that counts as part of your personal information. We may collect personal information from any of these sources:

Information provided by you:

- When you apply to us for a job;
- When you express interest in a job via the Society's website;
- When you complete employment application form;
- When you provide us with a copy of your CV;
- During your interview, including notes we make;
- When you talk to us on the phone during the recruitment process, including recorded calls and notes we make;
- By emails and letters;

Data we collect from outside sources:

- Companies that introduce you to us, such as a recruitment agency;
- Credit reference agencies such as CallCredit, Equifax & Experian;
- Referee's relating to employment;
- Public Directories such as the Electoral Register & Companies House;
- Government & Law Enforcement agencies;
- HMRC for tax related information;
- Your employer previous or prospective employer;
- Disclosure Barring Service or Disclosure Scotland.

6. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

This section explains how long we may keep your information for and why.

If you are unsuccessful following shortlisting, an assessment or an interview for a job you have applied for or have enquired as to if there are any vacancies, we will retain your information for a period of 12 months. After this time your information will be securely destroyed. The reasons we do this are:-

- To respond to a question or complaint, or to show whether we gave you fair treatment; or
- To obey rules that apply to us about keeping records.

If you are unsuccessful following shortlisting, an assessment or an interview for a job you have applied for we will ask you if you would like your information to be retained by us for a period of 12 months should another suitable job come up. If you say yes, we will retain your information until the end of this period at which point your information will be securely destroyed.

You can get more information about how long we keep data by contacting our Data Protection Officer.

If you are successful in your application, you will receive a Vernon Building Society Employee Privacy Notice which tells you how we use your information as an employee of the Society.

7. IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION

You can choose not to give us personal information. In this section we explain the effects this may have.

The information we ask for is used to assess your suitability and eligibility for a job in the Society. You don't have to provide what we ask for but it might affect your application if you don't.

8. HOW TO COMPLAIN

This section gives details of how to contact us to make a complaint about data privacy. It also shows you where you can get in touch with the government regulator.

Please let us know if you are unhappy with how we have used your personal information. See Contacting Us for how you can do this.

You also have the right to complain to the regulator, and to lodge an appeal if you're not happy with the outcome of a complaint. This is the Information Commissioners Office. Find out on their website how to report a concern.

9. HOW TO WITHDRAW YOUR CONSENT

This section explains what to do if you no longer want us to hold your personal information.

You can withdraw your consent at any time. Please contact us by emailing the Society's Data Protection Officer or HR & People Adviser if you want to do so.

This will only affect the way we use information when our reason for doing so is that we have your consent. See the section 'Your Rights' about more generally restricting the use of your information.

If you withdraw your consent, we may not be able to progress your application.

10. LETTING US KNOW IF YOUR PERSONAL INFORMATION IS CORRECT

This section explains how to contact us if you think the information we hold for you is wrong, incomplete or out of date.

You have the right to question any information we have about you that you think is incorrect. We'll take reasonable steps to check this for you and correct it.

If you want to do this, please contact our Data Protection Officer. See Contact Us for how you can do this.

11. HOW TO GET A COPY OF YOUR PERSONAL INFORMATION

This section tells you where to write to us to get a copy of your personal information, and how to ask for digital file you can use yourself or share easily with others. This is called a Subject Access Request.

You can do this by writing to our Data Protection Officer at this address:

Data Protection Officer
Vernon Building Society
19 St. Petersgate
Stockport
Cheshire
SK1 1HF

When you want to share your data with outside companies

You also have the right to get certain personal information from us as a digital file, so that you can keep and use it yourself, and give it to other organisations if you choose to.

We will provide it to you in an electronic format that can be easily reused, or you can ask us to pass it on to other organisations for you. If you want us to do this, please write to the Society's Data Protection Officer. See Contact Us for how you can do this.

12. YOUR RIGHTS

This section explains about your right to object and other data privacy rights you have and how to contact us about them.

You can object to us keeping or using your personal information. This is known as the '**right to object**'. You can also ask us to delete, remove or stop using your personal information if there is no need for us to keep it. This is known as the '**right to erasure**' or the '**right to be forgotten**'.

There may be legal or other official reasons why we need to keep or use your data, please tell us if you think that we shouldn't be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. You can ask us to restrict the use of your personal information if:

- Its not accurate;
- Its been used unlawfully but you don't want us to delete it;
- Its not relevant any more, but you want us to keep it for use in legal claims; and
- You have already asked us to stop using your data but you're waiting for us to tell you if we are allowed to keep on using it.

If we do restrict your information in this way, we won't use or share it in other ways while its restricted.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please write to the Society's Data Protection Officer. See Contact Us for how you can do this.

13. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share your personal information with outside organisations where it's appropriate to do so, such as Disclosure Barring Service, credit reference agencies, and previous employers. This is so we can assess your application, suitability for employment, and obey rules that apply to us. The types of organisations that we may share your personal information with are listed below.

We share your information with:-

Official bodies that include:

- Legal Advisors; and
- Law enforcement and Fraud Prevention agencies.

Banking & Financial Services

Outside companies that we work with to provide to you to run our business.

- Recruitment agencies, where you have applied via them;
- Credit Reference Agencies such as CallCredit, Equifax & Experian;
- Disclosure Barring Service;
- Previous employers to obtain references;
- Companies you ask us to share your information with; and
- Internal & External Auditors.

Employees

Access to information is restricted. Information is only available where it is needed by that person to perform their job.

- HR & People Adviser
- Employees carrying out recruitment, including shortlisting, assessment and interview

14. HOW WE USE YOUR INFORMATION TO MAKE AUTOMATED DECISIONS

We don't use automated systems to help us make decisions in our recruitment process.

15. CREDIT REFERENCE AGENCIES (CRAS)

We carry out a credit check when you accept a job with us. We use Credit Reference Agencies to help us with this.

During your employment, from time to time with your consent we may also search information that CRAs have, the regulators require us do this as part of our Conduct Regime checks of fitness and propriety.

We will share your personal information with CRA's to complete this check. The data we obtain from them can include:

- Name, address and date of birth;
- Details of any shared credit;
- Financial situation and history;
- Fraud prevention information; and
- Public information, from sources such as Electoral Register and Companies House

We use this data to:

- Undertake Conduct Regime fitness and proprietary checks;
- Understand your financial position periodically'
- Make sure what you've told us is correct and true; and

When we ask CRA's about you, they do not place a note on your credit file, this is called a soft footprint credit search. Other lenders will not see this.

The Vernon Building Society mainly uses CallCredit, but your personal information may be shared and information obtained from other Credit Reference Agencies.

Here are the details of the three main Credit Reference Agencies:

Credit Reference Agency	Contact Details
CallCredit PLC	1, Park Lane Leeds LS13 1EP Telephone:0330 024 7574 Email: consumer@callcreditgroup.com
Experian	Consumer Helpdesk Service Centre PO Box 8000 Nottingham NG80 7WF Telephone:0344 481 0800 / 0800 013 8888 Email: consumer.helpservcie@uk.experian.com
Equifax	Customer Service Centre POI Box 10036 Leicester LE3 4FS 0333 321 4043 / 0800 014 2955 Email: www.equifax.co.uk/ask

16. FRAUD PREVENTION AGENCIES

This section tells you about the information we share outside the Vernon Building Society to help fight financial crime. This includes crimes such as fraud, money laundering and terrorist financing.

We may need to confirm your identity before we employ you, this may include carrying out Disclosure Barring Service (DBS) check upon recruitment and periodically during your time as an employee of the Society as part of the Conduct Regime checks of fitness and proprietary.

As one of our employees, we will share your personal information as needed to help combat fraud and other financial crime. The organisations we share data with are:

- Registered Fraud Prevention Agencies (FPA's);
- Other agencies and bodies acting for the same purpose;
- Industry databases used for this purpose; and

When we have a business or commercial reason of our own to use your information, this is called a 'legitimate interest'. We will tell you what that is, if we are going to rely on it as the reason for using your data. Even then, it must not unfairly go against your interests.

We will use the information to:

- As part of the regulators Conduct Regime fitness and proprietary checks'
- Confirm identities;
- Help prevent fraud and /money laundering; and
- Fulfil any contracts we have with you.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to prevent, detect, investigate and prosecute crime.

These organisations can keep personal information for different lengths of time, up to six years.

The information we use

These are some of the kinds of personal information that we use:

- Name;
- Date of birth;
- Residential address;
- History of where you have lived;
- Contact details, such as email addresses and phone numbers;
- Financial data;
- Whether you have been a victim of fraud;
- Employment details;
- Data that identifies computers or other devices you use to connect to the internet;
- This includes your Protocol (IP) address, and systems you access; and
- Emails and correspondence.

17. SENDING DATA OUTSIDE THE EEA

This section tells you about the safeguards that keep your personal information safe and private, if it's sent outside the European Economic Area ('EEA').

We will only send your data outside of the EEA to:

- Follow your instructions;
- Comply with a legal duty; and to
- Work with our suppliers who help us run your accounts and services.

We are based in the UK, if we do transfer your personal information outside the EEA, we will make sure that it's protected to the same extent as in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the United States and European Union countries. It makes sure those standards are similar to what is used in the EEA.