

Privacy notice for job applicants

In accordance with the UK General Data Protection Regulation (UK GDPR), Regency Shipping Ltd, Ferrari Express Ltd, Regency Freight Services Ltd, Pinehurst Financial Services Ltd, Fairleonline Ltd & TCTV Ltd has implemented this privacy notice to inform you, as prospective employees of our Organisation, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

Data protection principles

Under UK GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- processing is fair, lawful and transparent
- data is collected for specific, explicit, and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisational measures
- we comply with the relevant UK GDPR procedures for international transferring of personal data.

Types of data held

Personal data is any information about an individual from which that person can be identified. It does not include anonymous data which does not identify the individual.

We collect, store and use several categories of personal data on our prospective employees to carry out effective and efficient processes. We keep this data in recruitment files relating to each vacancy and we also hold the data within our computer systems, e. g recruitment logs. It is your responsibility to keep us up to date with any changes to your personal details so that we can make sure that your personal data is accurate. If your personal details change, you must notify hr@rslhr.co.uk .

Specifically, we collect, store and use the following types of data:

- personal details such as names, previous names, title, address, phone numbers, email address, date of birth
- name and contact details of your next of kin
- your photograph
- your gender, marital status, information of any disability you have or other medical information
- right to work documentation
- information on your race and religion for equality monitoring purposes

- information gathered via the recruitment process such as that entered into a CV or included in a cover letter, interview notes and, where consent is given, audio recordings used solely to create interview notes.
- references from former employers
- details on your education and employment history, etc
- driving licence
- criminal convictions

Collecting your data

You provide several pieces of data to us directly during the recruitment exercise.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Should you be successful in your job application, we will gather further information from you, e. g. your bank details and next of kin details, once your employment begins.

Lawful basis for processing

The law on data protection allows us to process your data for certain reasons only.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment, e. g. promotion	Our legitimate interests which are to recruit, assess and promote suitable employees and workers, ensure fair and effective recruitment processes, and maintain a skilled and competent workforce.
Making decisions about salary and other benefits	Our legitimate interests which are to manage remuneration, benefits and reward structures fairly, competitively and consistently across the Organisation.
Making decisions about contractual benefits to provide to you	Our legitimate interests which are to efficiently administer contractual benefits, ensure accurate records, and support effective employment administration.
Assessing training needs	Our legitimate interests which are to identify training needs, support employee development, and maintain appropriate skills, competence and compliance.
Dealing with legal claims made against us	Our legitimate interests which are to establish, exercise or defend legal claims and protect the Organisation's legal rights.

Preventing fraud	Our legitimate interests which are to establish, exercise or defend legal claims and protect the Organisation's legal rights.
Interview notes and, where consent is given, audio recordings used solely to create interview notes	Our legitimate interests to conduct fair, consistent and effective recruitment processes; and legal obligation where interview notes must be retained for regulatory purposes. Where AI-assisted audio note-taking is used, this is carried out only with the applicant's explicit consent, as further explained in the AI Use section below.

Where consent is used as a lawful basis, it will be sought only where appropriate, freely given, and capable of being withdrawn without detriment.

Special categories of data

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We carry out processing activities using special category data:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments.

Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

Some categories of data, including health, criminal record and right-to-work information, are collected only after a conditional offer of employment has been made, unless earlier collection is required for regulatory or security reasons. Where we process special category or criminal conviction data, we do so in accordance with the conditions set out in Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018.

Failure to provide data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering a contract of employment with you. This could include being unable to offer you employment or administer contractual benefits.

Where a valid driving licence is required for the role, failure to provide this information may result in the application not progressing.

Criminal conviction data

Due to the nature of our business and security requirements in working with BAA and the security of the high value of goods handled and stored, if successful in the recruitment process and a job offer is made, the offer is dependent on the candidate accepting it is a term and condition of employment that candidates accept that a relevant check needs to be made with the Disclosure and Barring Service to ensure your suitability for the position and for the protection of our business. A Standard Disclosure will be required.

This data is collected at the recruitment stage, and a DBS check is obtained every 3 years with your consent. We use criminal conviction data to determine your suitability, or your continued suitability for the role. Where we process information regarding criminal convictions we will adhere to the guidelines currently in force regarding data security and data retention as determined by the appropriate governing body.

We rely on our legal obligation and substantial public interest conditions under UK data protection law to process criminal conviction data for aviation security and regulatory compliance purposes.

Who we share your data with

Employees within our company who have responsibility for recruitment will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with UK GDPR.

Data is shared with third parties only where necessary for recruitment, regulatory compliance, safety, or pre-employment screening purposes. This may include:

- recruitment agencies involved in the hiring process
- background screening and right-to-work verification providers
- driving licence verification providers, where driving is a requirement of the role
- the Disclosure and Barring Service (where required)
- regulatory bodies where required by law, including the Civil Aviation Authority
- IT service providers supporting recruitment and HR systems

All third parties are required to process personal data in accordance with UK GDPR and are subject to appropriate contractual and security safeguards.

We do not routinely transfer personal data outside the UK or EEA. Where any processing involves third-party systems, appropriate safeguards are in place.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Retention periods

We only keep your data for as long as we need it for, which, in relation to unsuccessful candidates, is 12 months.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for 12 months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for 12 months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

Automated decision making

Automated decision-making means making decisions about you using no human involvement, e. g. using computerised filtering equipment. No decision will be made about you solely based on automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights

You have rights in relation to your personal data under UK data protection law. These include the right to be informed, to access your data, to have inaccurate data corrected, to request deletion or restriction of processing in certain circumstances, to object to processing, and rights relating to automated decision-making.

Where processing is based on consent, you have the right to withdraw that consent at any time without detriment. Withdrawal of consent will not affect the lawfulness of processing carried out before it was withdrawn, and in some cases we may continue to process your data where permitted by law.

Further information about your rights and how to exercise them, including subject access requests, is available on request. To exercise your rights, please contact hr@rslhr.co.uk.

Making a complaint

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office,

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 524510.

Data protection compliance

The company is the data controller under UK GDPR. Responsibility for compliance rests with the Board of Directors, who have delegated responsibility of employee data to the Human Resources Manager hr@rsllhr.co.uk.

AI Use

The Organisation may use approved Artificial Intelligence (AI) tools, including AI-assisted interview note-taking tools, to support the accurate recording and summarisation of interviews.

AI note-taking tools are used only with the prior knowledge and explicit consent of applicants to take interview notes. Participants may withdraw consent at any time during a meeting, and recording will stop. Where consent is not given, interviews will proceed without the use of such tools.

The Organisation does not routinely retain full audio recordings. AI tools are used to assist with the creation of interview notes only.

Interview notes may be retained to meet regulatory requirements, including those imposed by the Civil Aviation Authority. Where an applicant is successful, interview notes will form part of the employee record. Where an applicant is unsuccessful, interview notes will be retained for up to 12 months and then securely deleted.

AI outputs are reviewed by a human and are not used to make automated decisions about applicants.

If you have any questions, concerns, or requests regarding your personal data, please contact us at: hr@rsllhr.co.uk

By submitting an application, you acknowledge that you have been provided with this privacy notice.