

Recruitment

# Data Privacy Notice

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## **Data Privacy Notice (DPN)**

We know that your personal data is important to you; we want to demonstrate our commitment to privacy and to inform you about the personal data we collect and process in connection with our recruitment and selection process. This Data Privacy Notice sets out an explanation of what personal data about you we process, why we process your personal data, with whom your personal data is shared and a description of your rights with respect to your personal data.

This Data Privacy Notice applies to people applying for a role with Cornmarket Group Financial Services Ltd.

By using and/or submitting personal data via this website you consent to Cornmarket Group Financial Services Ltd, using and sharing your personal data as set out in this Data Privacy Notice, including, without limitation, the processing of special category data.

Please read this Data Privacy Notice to understand how and why we use your personal data. This Data Privacy Notice will be reviewed from time to time to take into account changes in the law or changes in how we process your personal data.

If you have any queries in relation to our use of your personal data, you should contact the relevant Data Protection Officer or Data Protection contact as outlined in Section 8 of this Data Privacy Notice.

### **1. What is personal data?**

Personal data is any information that relates to you and can be identified as your information.

Personal data covers items such as your name, address, email address, mobile number, date of birth, Personal Public Service Number (PPSN) etc.

Personal data also includes special categories of data which require additional protection and includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or data concerning a person's sex life or sexual orientation. In addition, personal data includes data relating to criminal convictions and offences.

### **2. What personal data do we process?**

For prospective employees, we use personal data to undertake any activity relating to our recruitment and selection process and to administer employment contracts where candidates have been successful. This includes using your personal data to enable us to contact you, conduct interviews, assess your suitability as a potential candidate and if successful, preparing your employment contract and internal processing procedures to 'on-board' you. The processing is necessary to enter into a contract (where successful) and for our legitimate interests in managing an effective recruitment process. We may also need to process your personal data to ensure that we are complying with legal obligations, for example, it is mandatory to check a successful applicant's eligibility to work in Ireland before employment starts.

Where there is a need to process your data for a purpose other than those set out in this Data Privacy Notice or otherwise outlined to you, we will inform you of this.

Most of the personal data that we process about you is provided by you. In addition, we may collect personal data from:

- previous employers via references (with your permission);
- due diligence checks conducted for roles which are subject to the Fitness and Probity regime
- education institutions (e.g. proof of qualifications), and
- recruitment agencies

We also use cookies to follow the application process, to improve the use of our internet site.

Personal data required during this process includes, but is not limited to: Name, address, contact phone number, work history, education history, salary and benefits package, CCTV if you enter our premises for an interview, photograph for authentication, referee names, qualification certificates, interview notes and related documentation.

When you submit personal data about another person, for example, referees, to Cornmarket Group Financial Services Ltd we assume that you have their permission to share this information.

### **3. What happens if you do not provide us with your personal data?**

In some cases, you may decline to provide us with your personal data. However, if we believe that we require relevant information to effectively and properly manage your application through the recruitment process, we may not be able to continue with your job application.

### **4. How is your personal data shared?**

In some cases, you may decline to provide us with your personal data. However, if we believe that we require relevant information to effectively and properly manage our employment relationship, we may not be able to continue our employment relationship with you if you decline to provide us with that personal data.

We share personal data only on the basis of the purposes for which it was collected including:

#### **Cornmarket Group Financial Services Ltd:**

Your personal data will be shared with Cornmarket Group Financial Services Ltd as they act as your prospective employer. For recruitment purposes, your data may be shared with your prospective employers' recruiting managers'.

If you agree for your CV to be retained for possible future vacancies, we may share your data within our group.

#### **Cornmarket Group Financial Services Ltd- service providers:**

- Resourcing partners: if you are being represented by a registered third party resourcing partner, we will share the required personal data with them to facilitate any communication needed throughout the recruitment process.
- Information system (IS) providers: your personal data is stored on our HR IS providers (including Cloud based applications). We ensure that the companies/bodies selected have the appropriate organisational, technical measures and safeguards in place to protect your personal data.
- Online assessment providers: we may share your personal data with online assessment providers if an online assessment is part of the selection process.
- Occupational health specialists: we will share required personal data with our Occupational Health Specialists (OHS) where required.
- Auditors: we will share required personal data with our external auditors only when your recruitment file has been randomly selected as part of an audit.
- Facilities: We will share required personal data with facilities for authentication purposes.
- There is CCTV in operation in our offices nationwide.
- Independent contractors: occasionally we engage with external contractors to complete a specific type of work, for example, recruitment and selection. Your personal data may be shared with these individuals in the course of carrying out their specified purpose.
- External consultants: companies that act as a service provider under contract with us and only process your personal data as instructed by Cornmarket Group Financial Services Ltd. Your personal data is transferred securely and is not used by other parties for any other reason.

#### **Regulators:**

Fitness and Probity: we share personal data in relation to the Central Bank of Ireland's Fitness and Probity regime with relevant regulatory authorities, for example the Central Bank of Ireland and other financial services providers where a corporate working partnership exists.

#### **Legal:**

Your personal data will be shared with other companies, organisations and associations in order to prevent detect or investigate crime. We will also share any information that is required by law.

## 5. Will your personal data be transferred abroad?

Given the global nature of our business, we share your personal data with our parent company – Great-West Life Group, Canada and associated companies for legitimate business interests, for example, recruitment status reports. When doing this, we may use third party suppliers and outsourced services (including cloud based services), which can require transfers of personal data outside of the EU. When this happens, we will ensure that the companies/bodies selected have the appropriate organisational and technical measures in place to protect your personal data. This means that you have a similar standard of protection as you have within the EU.

## 6. How long do we keep your information?

Your personal data will only be retained for as long as required and in compliance with the Data Protection Act 1988 to 2018 and the General Data Protection Regulation (GDPR) (EU) 2016/679 all of which as amended, varied and supplemented from time to time, local employment legislation and internal policy and practices.

## 7. What are your rights under data protection law?

You have the following rights under data protection law, although your ability to exercise these rights may be subject to certain conditions:

- the right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data;
- the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete;
- the right, in certain circumstances, to request that we erase your personal data;
- the right, in certain circumstances, to request that we no longer process your personal data for particular purposes, or object to our use of your personal data or the way in which we process it;
- the right, in certain circumstances, to transfer your personal data to another organisation; and
- the right to complain to the Data Protection Commissioner.

## 8. Data Protection Officer (DPO) or Data Protection contact

If you have any queries in relation to this data privacy notice, or if you have any concerns as to how your personal data is processed, contact the relevant Data Protection Officer/contact:

Employer	Data Protection Officer
Cornmarket Group Financial Services Ltd	Data Protection Officer, Compliance Department, Cornmarket Group Financial Services Ltd, Liberties House, Christchurch Square, Dublin 8.  Tel: 01 4084000 Email: <a href="mailto:dataprotection@cornmarket.ie">dataprotection@cornmarket.ie</a>

## 9. Complaints

If you are not happy with how we have processed your personal data or handled your data protection rights, you can complain to the Data Protection Commission by contacting them below:

### Data Protection Commission,

Canal House,  
Station Road,  
Portarlinton,  
Co. Laois, R32 AP23

**Telephone:** +353(0)761 104800

**LoCall:** 1890 252231

**Fax:** +353 57 8684757

**Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

**This Privacy Notice is effective from 25th May 2018.**