

## **Job Applicant Privacy Notice (Updated 19 December 2018)**

As part of any recruitment process, SSE collects and processes personal data relating to job applicants. SSE is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What personal data do we collect?**

SSE collects a range of information about applicants during the recruitment process.

This may include:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether you have a disability for which SSE needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK.

SSE may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, on-line recruitment tools, obtained from your passport or other identity documents or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in recruitment and Human Resource (“HR”) management systems and on other Information Technology (“IT”) systems (including email).

### **Why does SSE process personal data?**

We need to process data to take steps as part of the recruitment process, prior to entering a contract with you. We may also need to process your data to enter into a contract with you if you are successful in your application for employment.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts.

SSE has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend legal claims.

SSE may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief in order to monitor diversity in recruitment.

During the process, we may also capture some sensitive personal data about you (e.g. disability information). We do this in order to make reasonable adjustments to enable our job applicants to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting at SSE (if successful) and to ensure that we comply with regulatory obligations placed on us with regard to recruitment.

### **How is your personal data transferred outside of the EEA?**

We, or a third party who we share personal information with, may host, store and handle that personal information outside of the European Economic Area (EEA).

We will only permit this to happen if adequate safeguards have been put in place to protect your personal information. This means that we will:

- (a) ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission under Article 45 of the General Data Protection Regulation (GDPR);
- (b) include standard data protection clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties (these are the clauses approved under Article 46.2 of the GDPR); or
- (c) (in the case of transfers from the EEA to the USA), ensure that the recipient of the personal information is certified with the US-EU Privacy Shield Framework, as permitted by Article 46.2 of the GDPR.

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

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers/assessors involved in the recruitment process, managers in the business area with a vacancy and ***IT staff if access to the data is necessary for the performance of their roles.***

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you and other third parties as part of the pre-employment screening process. This may include: academic institutions, credit reference agencies, occupational health service providers, criminal records bureaus and the DVLA. We may also share your information with third party suppliers who carry out pre-employment screening on our behalf. We will always ask for your consent before processing this type of data as part of pre-employment screening.

### **How does SSE protect personal data?**

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees or authorised third parties in the proper performance of their duties.

### **For how long does SSE keep personal data?**

SSE will hold your data on file for two years from the end of any relevant recruitment process and at the end of that period, we will delete your personal data from our systems if we have not had any further meaningful contact with you (or, where appropriate, the company you are working for or

with.) If we have had further meaningful contact with you, your personal data will be kept for two years from this point (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those job applicants, whose services are provided via a third-party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than two years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.

When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a candidate we will consider there to be meaningful contact with you if you submit your updated CV onto our website. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications.

SSE will hold all interview notes and documentation that we collate from you during the recruitment assessment stage for 6 months.

SSE will transfer relevant data for all successful job applicants to our HR systems. The period for which your data will be held should you become an employee will be provided to you in the privacy notice for employees.

You are able to delete your Account from our Applicant Tracking System (ATS) at any time by logging into your [Applicant Profile](#), clicking on Account and then selecting "Remove Account"

### Your rights

You have the following rights regarding your information:

Rights	What does this mean
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we're providing you with the information in this Privacy Notice.
2. Right of access	You have the right to obtain access to your personal data (if we're processing it) and certain other information (similar to that provided in this Privacy Notice). This is so you're aware and can check that we're using your personal data in accordance with data protection law.
3. Right to rectification	You are entitled to have your personal data corrected if it's inaccurate or incomplete.
4. Right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there's no

	compelling reason for us to keep it. This is not an absolute right to erasure; there are exceptions.
5. Right to restrict processing	You have rights to ‘block’ or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further. [We keep lists of people who have asked for further use of their personal data to be ‘blocked’ to make sure the restriction is respected in future.]
6. Right to data portability	You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
7. Right to object to processing	You have the right to object to certain types of processing, in certain circumstances. In particular the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.
8. Right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for direct marketing.

## Contacting us

If you would like to contact us in relation to your rights or if you are unhappy with how we’ve handled your information, you may contact us in the following ways:

Writing: HR Data Protection Specialist  
HR Service Centre  
Inveralmond House  
200 Dunkeld Road  
Perth  
PH1 3AQ

Telephone: 0345 072 1942

Email: [HRGDPR@sse.com](mailto:HRGDPR@sse.com)

If you would like to contact our Data Protection Officer, you may do so using the following details:

Writing: Data Protection Officer  
No. 1 Forbury Place,  
43 Forbury Road,  
Reading,  
RG1 3JH

Email: [dpo@legal.sse.com](mailto:dpo@legal.sse.com)

If you're not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) using the following details:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
Telephone number: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)