

# Privacy Notice for Applicants

Danske Bank

## Who we are

Danske Bank is the trading name of Northern Bank Limited which is a member of the Danske Bank Group (the Group). Danske Bank wants to be recognised as a trusted financial partner and is committed to protecting and respecting your privacy. We will treat your information as confidential at all times, even when you are no longer a potential employee/worker. This privacy notice describes how we collect and use personal information about you during the recruitment process, in accordance with the Data Protection Laws.

As a "data controller", Danske Bank determines the purposes for processing your information and is required under data protection legislation to notify you of these purposes in a Privacy Notice.

This notice does not form part of any contract of employment or other contract to provide services. It is important that you read this notice so that you are aware of how and why we are using such information.

## What personal information do we collect?

Personal information (personal data) is any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of sensitive personal data that require a higher level of protection.

We will collect, store, and use the following different kinds of personal information data about you including:

- Personal contact details such as name, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Applicant Reference.
- Recruitment information (including copies of interview record sheets and other information included in a CV, application form or cover letter or as part of the recruitment process).
- Right to work in the UK documentation.
- Proof of identification (eg passport, driving licence Immigration document)
- Proof of address
- Psychometric assessment.

- Qualifications.

We may also collect, store and use the following "special categories" of sensitive personal information:

- Information about your race or ethnicity, nationality, religious beliefs / community background, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

### **Where do we collect your information from?**

We collect personal information about potential employees and workers through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers and credit reference agencies.

### **Reasons we collect and use your personal data**

We will use your personal information in order to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our recruitment processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role. We may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests

We also need to process your personal information to decide whether to enter into a contract with you.

### **How we use your personal data**

The following are types of situations when we will process your personal information.

- Making a decision about your recruitment.
- Determining the terms on which you work for us, if appropriate.
- Checking you are legally entitled to work in the UK.
- Administering any contract we may propose to enter into with you, if appropriate.
- Ascertaining your fitness to work.
- Complying with health and safety obligations.
- To prevent fraud.
- Equal opportunities monitoring.
- Research purposes.

## **What happens if you fail to provide personal information?**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## **Change of purpose**

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for another unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

## **How we use sensitive personal information**

"Special categories" of sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. With your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.

We may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about potential employees/workers in the course of legitimate business activities with the appropriate safeguards.

We will also use your sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, community background, religious, philosophical or moral beliefs, or sexual orientation, as may be required to ensure meaningful equal opportunity monitoring and reporting.

We do not need your consent to use your sensitive personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

## **Information about criminal convictions**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our legal/regulatory obligations. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

## **We may also process such information about potential employees/workers in the course of legitimate business activities with the appropriate safeguards.**

We envisage that we will hold information about criminal convictions.

Where required we will collect information about criminal convictions as part of the recruitment process or we may receive such information directly from you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- Regulatory reporting purposes.
- Making decisions about recruitment.

## **Sharing your information**

We may share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU and if we do, you can expect a similar degree of protection in respect of your personal information.

## **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required to do so by law, where it is necessary to administer your application or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. Third party service providers carry out the following activities: IT services, security vetting administration, credit reference agencies and employment agencies. Third parties also include financial regulators or other certification body where relevant to the post being applied for.

## **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

## **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **Data security**

We have put in place measures to protect the security of your information. Details of these measures are available within the business procedure 'Security Policy for Danske Bank Group.' Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will retain your personal information for a period of 5 years after we have communicated to you our decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. We also retain the information in order to monitor and review whether or not we are providing fair participation in employment as required by law. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a potential employee or worker of the company we will retain and securely destroy your personal information.

## **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the recruitment process with us.

## Your privacy rights

**You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, which are set out below.**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO – Data Protection Officer in writing.

There may however be legal or regulatory reasons why we need to keep or use your information. We may sometimes be able to restrict the use of your information so that it is only used for legal claims or to exercise legal rights. In these situations we would not use or share your information while it is restricted.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO – Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Data protection officer**

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection legislation. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Data Protection Officer by writing to the Data Protection Officer, Danske Bank, Donegall Square West, Belfast, BT1 6JS or by emailing us at 'yourprivacyrights@danskebank.co.uk'

## **Complaints**

If you are unhappy with how we have handled your personal information, you have the right to complain to the Information Commissioner's Office. You can contact them by writing to the:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF