

# Privacy Notice for Candidates

## **Integrated Management System (IMS)**

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## Privacy Notice for Candidates

### 1. What is a privacy notice?

The Imagination Group Limited (“Imagination”) is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. We want to ensure you understand and are aware as part of our recruitment process what information we collect about you, how we will use it and for what purpose. We are also required by data protection legislation to explain certain matters to you.

### 2. What information about you will we collect and use?

As part of the application process for an advertised vacancy or as part of a speculative application with Imagination, we will collect, store and process personal information about you.

This personal information may include your:

- name, date of birth, address, contact details;
- eligibility to work in the role location;
- academic record and qualifications;
- recruitment and employment history including information about your skills, experience and previous salary details; and
- any other information you have provided to us voluntarily (including in your CV, Covering Letter and during an interview).

We obtain this information either directly from you or sometimes from third parties such as employment agencies, your former employer(s) and background check agencies.

### 3. How and why will we use your personal information?

As you will appreciate, we need to use your personal information to process your application and determine your suitability for the role. We also need to ensure that we comply with our legal obligations regarding your right to work in the UK and any other regulatory requirements.

In most cases the legal basis for processing the data will be to ensure that we are complying with our legal obligations or where we need to in order to further Imagination’s legitimate business interests.

The situations in which we will commonly use your personal information include:

- to make informed recruitment decisions;
- to follow our vetting processes;
- to take steps to enter into a contract
- to make any reasonable adjustments (as notified by you) as part of the interview process

We are guided by the principle that you should not be surprised by any use we make of your personal information.

#### **4. What happens if you do not provide personal information?**

You are required by law to provide certain personal information to us, for example to enable us to verify your right to work in the UK in the event that we offer you employment.

If you fail to provide certain personal information when requested, we may be prevented from complying with our legal obligations and therefore would be unable to continue with your application.

#### **5. Consent**

If your application is unsuccessful or if there is no suitable vacancy available, Imagination will keep your personal data on file for 6 months in case there are future employment opportunities with Imagination which may be suitable. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

#### **6. Who else might your personal information be shared with?**

Following our decision to offer you a contract of employment, we may share your information with hiring managers, previous employers or named individuals as part of a reference request process.

As some of our supporting systems are located outside of the UK and the European Economic Area (the European Economic Area being the European Union, Iceland, Liechtenstein and Norway, which is also referred to as the “**EEA**”), your personal data may be stored and processed in countries that may not have data protection laws that provide the same level of protection as those within the UK or the EEA. However, Imagination will only transfer your personal data outside of the UK and the EEA where appropriate safeguards have been put in place. If you would like to know more about this, see the contact details at the bottom of this notice.

#### **7. For how long will your personal information be kept?**

If your application for employment is successful, you will be sent a new privacy notice for employees. Information gathered during the recruitment process will be transferred.

Following an unsuccessful application for employment, your personal data will be retained for up to 6 months from the close of the recruitment campaign. This will enable us to deal with any potential or actual disputes or investigations relating to the recruitment exercise and to consider you for any other suitable opportunities that may arise.

#### **8. How will your personal information be kept safe?**

We take the security of your personal information very seriously and we have put in place internal controls and security measures to protect it. Access to your personal information is restricted to those employees, workers and agents who strictly need it as part of the recruitment process. We also have cyber security measures in place. We take steps to ensure that third parties who have access to your personal data only process it on our instructions and are subject

to a duty of confidentiality. We have put in place appropriate procedures to deal with any suspected data security breach.

## 9. What are your rights in relation to your personal information?

You have certain rights in relation to your personal data as summarised here:

- **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 are providing you with this privacy notice;
- **Right of access** – you can request access to your personal data;
- **Correcting or erasing your information** – where we hold information about you that is inaccurate or incomplete, you have the right to ask us to rectify or complete it;
- **Right to restrict processing** – you have the right to restrict some processing of your personal information, which means that you can ask us to limit what we do with it;
- **Right to object to processing** – you can object to us processing your personal information in certain circumstances, including where we are using it for the purpose of Imagination’s legitimate business interests as set out within this policy;
- **Right to request transfer** -you have the right to request the transfer of your personal information to another party;
- **Right to complain** – you are able to submit a complaint to the Information Commissioner’s Office about any matter concerning your personal information, using the details below. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them.

Information Commissioner’s Office  
Wycliffe house  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel 0303 123 1113  
[www.ico.org](http://www.ico.org)

If you would like to exercise any of these rights, please contact us using the details below.

## 10 Questions?

For more details or any questions about anything in this privacy notice, please contact our [People & Culture team](#).

Our general contact details are: The Imagination Group Limited, 25 Store Street, London, WC1E 7BL, UK.