



## Applicant Privacy Policy

CITY FOOTBALL GROUP

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## Applicant Privacy Policy

### Introduction

City Football Group Limited is a company registered in England and Wales with registration number 08355862 and registered office at Regent's Place 14th Floor, 10 Brock Street, London, NW1 3FG.

We are registered with the Information Commissioner's Office with registration number ZA234714.

We use your information to verify your identity and process your application for employment. For more detail please see Annex 1.

In most cases our use of your information is necessary and carried out on the following legal grounds: in relation to and in line with your application for employment;

Where you consent to us processing your information for other purposes you can withdraw your consent at any time.

### What information do we use?

We may collect the following information to identify you, your employment history and qualifications, your experience and performance provided to us during this application process.

We may collect "special categories" of particularly sensitive personal information about you. This type of information requires higher levels of protection. It could include information about your ethnicity, religion, physical or mental health, or other sensitive information from you. We may collect this information where you disclose it to us and where it is necessary for the purposes of complying with the law in relation to your application (or law which is applicable as a result of your employment, such as our obligations under Health and Safety and Equality legislation). We may also process this information where you have provided your explicit consent. You have a right to withdraw your consent (see below) but this will not affect any processing which has already occurred. For more detail please [click here](#).

### Who may we share your information with?

We may share your information with:

- law enforcement agencies or regulatory bodies where we are required to do so; or,
- where we believe, in good faith, that it is necessary to protect our rights, property, safety or reputation or the rights, property, safety or reputation of any of our clients or partners.

We will only use your personal information for the purposes of your application process.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Where is your information stored?

The information we collect and hold about you may sometimes be transferred outside of the European Economic Area (the EEA), for example where we share it with other entities in our group. To ensure that your personal information is adequately protected we have put in place. If you require more information, please contact CFG's Human Resources department by emailing [HROperations@cityfootball.com](mailto:HROperations@cityfootball.com)

Where you apply for employment but are unsuccessful we will normally keep your data for up to six months.

### Automated decision-making updates

We do not use automated decision-making and profiling techniques.

Updates to this policy will be posted on our careers webpage from time to time and notified to you by email where appropriate.

### Your rights

**Right of access** You have a right to access the personal information we hold about you

**Right of rectification** You can ask us to correct or update your information to ensure it is accurate and complete.

**Right to erasure and right to restrict processing** You can ask us to stop processing and to delete your data in certain circumstances (for example where it is processed with your consent, or it is no longer necessary for us to process it).

**Right to data portability** You have a right to ask us to provide you with information in a form that suits you, and/or to provide your information to a third party.

**Right to object** You have a right to object to our processing of your information.

**Rights: profiling and automated decisions** You have a right not to be subject to automated decisions which have a legal effect and to be protected by safeguards in respect of any profiling.

### Contact and Complaints

If you have a question, want to exercise your rights or make a complaint, please contact Mark Lord, HR Operations Manager at [mark.lord@cityfootball.com](mailto:mark.lord@cityfootball.com).

You can also make a complaint to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113. [www.ico.org.uk](http://www.ico.org.uk).

## **Annex 1 – situations and purposes for which we may process your information**

We may process your personal information for the following purposes during your employment/engagement:

- Making a decision about your recruitment or appointment / engagement.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Assessing qualifications for a particular job or task, including decisions about promotions or job moves
- Ascertaining your fitness to work.
- To prevent fraud.
- Equal opportunities monitoring and promotion
- To write to third party companies that require us to confirm your employment status for the purposes of your personal activities e.g. application for mortgages, application for employment elsewhere.

## **Annex 2 – what information we may collect about you**

We may collect, store (in line with our Retention Policy), and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Termination date and reason for leaving the Company
- Location of employment or workplace.
- Eligibility to work details.
- Work-related travel details.
- Copy of driving licence and details relating to your continuing eligibility to drive a vehicle
- Vehicle insurance details and records of accidents in company vehicles
- Details about your personal or work vehicle and insurance
- Recruitment information (including references and other information included in a CV or cover letter or as part of the application process).

- Employment/engagement records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information (including historical).
- Competencies, skills and qualification details.
- Learning and development history.
- Disciplinary and grievance Information about time away from the business that is not annual leave or sickness-related e.g. special leave, time off for dependents, study leave etc.
- CCTV footage and other information obtained through electronic means such as swipecard records.
- Information about your use of our information and communications systems, including your internet usage on City Football Group IT assets.
- Photographs.

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

- Information about your age, gender reassignment, race, religions or belief, sex or sexual orientation
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Information about maternity, paternity, shared parental or adoption leave taken whilst engaged with the Company

Information about criminal convictions and offences.

### **Annex 3 – special categories of data: how and why we may use your sensitive information about you**

#### **Lawful basis for processing and our obligations as an employer**

"Special categories" of particularly 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:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our data protection policy
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, 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 will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to administer pay and comply with employment and other laws.
- We will use information related to sickness or injury to contact your next of kin/emergency contact in the event of an emergency.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- Where you suffer an accident or fall ill at work, we may use your information for the purposes of compliance with employment and health and safety law.
- We will use your equality information (as listed in 'Special Categories' in Annex 2) to ensure meaningful equal opportunity monitoring and reporting.

- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

### **Do we need your consent?**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law and other relevant laws. 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. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **Background checks and 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 obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- Assessing suitability to fulfil a contract of employment, where safeguarding customers is relevant;
- Assessing suitability to fulfil a contract of employment, where financial impropriety is relevant.