

# Willmott Dixon Website & Candidate Privacy Notice

Willmott Dixon Holdings and its subsidiary companies ("We" and "Us") respect your privacy and are committed to managing and safeguarding the information you provide to us. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format and you can select any of the specific areas below to be taken directly them:

- 1. Important information and who we are
- 2. <u>Visitors to our website</u>
- 3. <u>Cookies</u>
- 4. <u>E-newsletter</u>
- 5. Your rights
- 6. Access to personal information
- 7. Disclosure of personal information
- 8. Data Security
- 9. <u>Specific information for job applicants (potential, current and former Willmott</u> <u>Dixon employees)</u>
- 10. Links to other websites

# **1.** Important information and who we are

#### Purpose of this privacy notice

This privacy notice aims to provide you with specific information on how we collect and process your personal data through the use of our website.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing your personal data to ensure that you are fully away of how and why we are using your data. This privacy notice supplements all of our notices issued by Willmott Dixon Holdings and/or its subsidiary companies and is not intended to override them.

#### Controller

We are the Data Controller and we are responsible for your personal data.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights please contact the DPO using the details set out below:

Philip Wainwright Data Protection Officer Willmott Dixon Holdings Limited Spirella 2 Icknield Way Letchworth Garden City Herts

Document Name	Ref	Document Owner	Issue No	Effective date:
Willmott Dixon Website & Candidate Privacy Notice	CS-GDPR-003	Group Company Secretary	1	1 May 2018



SG6 4GY

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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please consider contacting us in first instance.

# Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 1<sup>st</sup> May 2018.

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

#### 2. Visitors to our website

When someone visits <u>www.willmottdixon.co.uk</u> we use a third party service, Lead Forensics to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Lead Forensics to make any attempt to find out the identities of those visiting our website.

#### 3. Cookies

You can read more about how we use cookies on

https://www.willmottdixon.co.uk/cookie-policy

#### 4. E-newsletter

When signing up for our newsletter we will collect your name and email address. We use a third party provider, Gravity Forms, to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. When signing up for the newsletter we will only use the information you provide for the purpose of that process.

This is necessary for our legitimate interests, to study how our products/services are being used, to develop them, to grow our business and to inform our marketing strategy.

#### 5. Your rights

Under the data protection legislation, you have rights as an individual which you can exercise in relation to the information we hold about you.

- Right of access
- Right to rectification
- Right to be forgotten
- Right to restriction

Document Name	Ref	Document Owner	Issue No	Effective date:
Willmott Dixon Website & Candidate Privacy Notice	CS-GDPR-003	Group Company Secretary	1	1 May 2018



- Right to be informed
- Right to portability
- Right to object

If you wish to exercise any of the rights set out above, please contact the Data Protection Team at the address below.

Data Protection Team Willmott Dixon Holdings Limited Spirella 2 Icknield Way Letchworth Garden City Herts SG6 4GY

# 6. Access to personal information

As an organisation we try to be as open as we can in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the data protection legislation. Where we hold information about you we will:

- Give you a description of it;
- Tell you why we are holding it;
- Tell you who it could be disclosed to; and
- Let you have a copy of the information in an intelligible form.

To make a request to find out about any personal information we may hold you need to put the request in writing addressing it to <u>data.protection@willmottdixon.co.uk</u>, or writing to the address below:

Data Protection Team Willmott Dixon Holdings Limited Spirella 2 Icknield Way Letchworth Garden City Herts SG6 4GY

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by contacting the Data Protection Team.

#### 7. Disclosure of personal information

We will only share personal information for stated reasons in this Privacy Notice or in line with the data protection laws.

Document Name	Ref	Document Owner	Issue No	Effective date:
Willmott Dixon Website & Candidate Privacy Notice	CS-GDPR-003	Group Company Secretary	1	1 May 2018



The following information is available via our Data Protection Team:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

#### 8. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, 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.

# 9. Specific information for job applicants (potential, current and former Willmott Dixon employees)

We are the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at <u>careers@willmottdixon.co.uk</u>.

#### What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of processing your application, or to fulfil legal or regulatory requirements if necessary. We will only share your personal information with the following third parties for the purposes of processing your application:

- A recruitment agency or search consultancy with whom you have registered or instructed to feedback on interviews or to process your application;
- A third party provider of skills, aptitude or psychometric testing used in the selection process;
- A third party provider of recruitment software; and
- Associated Companies;

All our third-party service providers and Associated Companies 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.

"Associated Companies" refers to those companies belonging to the same family of companies as us and who benefit from a close relationship, shared systems and shared ownership.

Document Name	Ref	Document Owner	Issue No	Effective date:
Willmott Dixon Website & Candidate Privacy Notice	CS-GDPR-003	Group Company Secretary	1	1 May 2018



We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

#### What information do we ask for?

- The information you have provided to us in your CV and covering letter;
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications;
- Any information you provide to us during a face to face or video interview; and
- The results of any assessments or competence tests that you took including aptitude or psychometric testing;

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health, including any medical condition (if appropriate);
- Information about criminal convictions and offences; and
- Carry out background and reference checks, where applicable

# Application stage

If you use our online application system, this will be collected by a data processor on our behalf.

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information and if you choose not to provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide will be used only to produce and monitor equal opportunities statistics.

#### Shortlisting

Our hiring managers shortlist applications for interview. They will be provided with your application but not your equal opportunities information, if it has been provided.

Document Name	Ref	Document Owner	Issue No	Effective date:
Willmott Dixon Website & Candidate Privacy Notice	CS-GDPR-003	Group Company Secretary	1	1 May 2018



#### Assessments

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview; or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes.

If you are unsuccessful following assessment for the position you have applied for, we will retain your details in our talent pool for a period of 12 months unless you tell us otherwise. If you say yes, we would proactively contact you should any further suitable vacancies arise.

# **Conditional offer**

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and we may use a third party to undertake these checks.

# You will therefore be required to provide:

- Proof of your identity and right to work you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- We will provide your email address to the Government Recruitment Service who will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references.
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

#### If we make a final offer, we will also ask you for the following:

- Bank details to process salary payments.
- Emergency contact details so we know who to contact in case you have an emergency at work.
- Membership of a Civil Service Pension scheme so we can send you a questionnaire to determine whether you are eligible to re-join your previous scheme.

#### Use of data processors

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do

Document Name	Ref	Document Owner	Issue No	Effective date:
Willmott Dixon Website & Candidate Privacy Notice	CS-GDPR-003	Group Company Secretary	1	1 May 2018



anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

#### Lumesse

If you use our online application system, you will provide the requested information to Lumesse who provide this online service for us.

#### How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 7 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

All candidates will remain in our Talent Pool (on our recruitment system) so that we can stay in regular contact with you and keep you updated should a suitable role become available. Your candidate details will include the information you provide us in your original application and any notes from interviews or assessments. You can update preferences through your personal portal or through our recruitment team; this includes the removal of your details from our Talent Pool if you wish.

# How we make decisions about recruitment?

Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account. Please note that information in regards to applicants will be shared between recruitment and hiring managers. This will be on our secure CE+ servers and domain.

You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing <u>careers@willmottdixon.co.uk</u>

# **10.** Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy statements on every websites you visit.

Document Name	Ref	Document Owner	Issue No	Effective date:
Willmott Dixon Website & Candidate Privacy Notice	CS-GDPR-003	Group Company Secretary	1	1 May 2018