

Applicant Privacy Notice

Notice last updated: November 2023

This privacy notice is for people who apply for a role with us. We are committed to protecting your privacy when dealing with your personal information as part of your application for work with us.

This notice provides details about the information we collect about you, how we use it and how we protect it as part of our recruitment process. It also provides information about **p**

If you have any questions about how we handle your information, please contact us at dataprotection@bupa.com.



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1. Information about us

In this privacy notice, 'we', 'us' and 'our' mean The British United Provident Association Limited and its subsidiaries (the 'Bupa Group'). For company contact details, click [here](#).

Please contact your recruitment officer for information about which Bupa Group company collects and uses your personal information during the recruitment process.



2. What this privacy notice covers

In this privacy notice, references to 'work' include permanent and temporary employment, as well as bank (casual) work, agency work, independent contractor work, traineeships, work experience placements and volunteering. We may give you further privacy information, if necessary, for specific reasons.



3. How we collect personal information

We collect personal information from you and from certain other people and organisations (for example, people acting on your behalf, such as recruitment agencies).

You must provide most of this personal information so that we can meet our obligations, you can enjoy the benefits that we offer, and we can manage our relationship with you properly. If you do not provide this personal information, these outcomes may not be possible.

If you provide us with information about other people (for example, your referees), you must make sure that they know you are doing this and do not object to you giving us their information. You should also make them aware of this privacy notice.

We collect personal information from you through your interactions with us, including by phone, by email, through our websites, by post, by filling in application or other forms, face-to-face (for example, in interviews), by taking part in assessments (for example, psychometric assessments such as online personality tests and presentation exercises in group interviews), and on social media.

We also collect personal information about you by monitoring your access to our premises (such as from CCTV, door entry systems and workplace health screening).

We also collect **special categories of personal data** to ensure proper equal opportunity monitoring, this data is collected from candidates voluntarily.

The types of data collected are:

- Health data (both physical and mental health)
- Gender identity (including transgender status)
- Racial or ethnic origin
- Religious belief
- Sexual orientation

We collect personal information from people and organisations such as:

- Your agents (for example, a recruitment agency, trade union representative or legal representative);
- Your referees (for example, your former employer);
- Any service providers who work with us in relation to your employment (for example, selection companies and providers of online assessments);
- Your parent or guardian, if applicable
- Doctors, other clinicians and healthcare professionals, hospitals, clinics and other healthcare providers to help with workplace health and safety;
- Our agents (for example, our legal representatives if we are involved in legal proceedings against you);
- Credit reference agencies, fraud detection agencies, criminal history reference agencies, if we need to carry out relevant checks (we will tell you at the time if we collect information from you to carry out these checks, and there is more information in the 'criminal offence information' section below);
- Government departments (for example, the tax office or social security office);
- Sources which are available to the public, such as: during your recruitment, we may look at your LinkedIn page to get an overview of your professional history and qualifications, and we may also read any work you have had published that is relevant to the role we are considering you for, such as research or academic articles.



4. Types of personal information

We process the following types of personal information about you and (where this applies) your dependants.

- **Standard personal information** (for example, information we use to contact you, identify you or manage our relationship with you).
- **Special categories of information** (for example, health information in connection with workplace health screening, information about race, ethnic origin and religion for diversity and inclusion purposes).
- **Criminal offence information** (for example, information relating to criminal convictions and offences, or related security measures). We collect this in line with our local *Employment Screening Policy* and local *Candidate's Guide to Bupa Employment Check Standards*. If you would like more information about these checks, you can ask your recruitment officer for a copy of these policies.

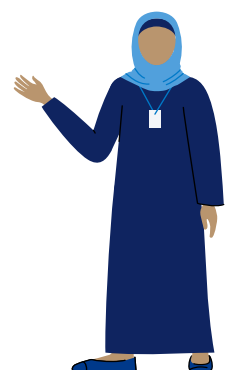
Standard personal information includes:

- Contact information (for example, your name, username, address, email address and phone numbers);
- The country you live in, your age, your date of birth, sex or gender, and national identifiers (for example, your National Insurance number, passport number or driving licence number), your nationality, your right to work in the UK and any other countries where you may remotely work from;
- Details of your previous work and your education, professional certificates and registrations, other information from your CV and employment references, as well as interview notes;

- Financial details (for example; payment details and bank details, salary);
- Photographs and videos from our CCTV systems; and the times when you enter and leave our offices (which we collect from our door entry systems), logs of your use and access to our systems and devices; and image/voice recordings of meetings or events;
- The results of any background checks (not including criminal history checks) we have carried out on you (if you would like more information on these checks, you can ask your recruitment officer for a copy of our local *Employment Screening Policy* and *Candidate's Guide to Bupa Employment Check Standards*);

Special category information includes:

- Information about your physical or mental health (you might provide this information when filling in application forms, it may also come from notes and reports about your health and any treatment and care you have received or need, medical certificates, results of psychometric assessments, or information we collect during workplace health screening (such as using thermal imaging or checking your temperature); and
- Information about your race, ethnic origin, sexual orientation and religion (this information may be included in application forms - you do not have to provide it but if you do we use it on an aggregated basis to support diversity and inclusion initiatives); and
- Information about your disability or long-term health condition (this information may be included in application forms to allow for any required adjustments as well as support diversity and inclusion initiatives on an aggregated basis).





5. What we use your personal information for

We process your personal information to:

- Manage the recruitment process and our relationship with you, our business and the people and organisations who provide services for us;
- Protect our (or our customers' or other people's) rights, property or safety, including to maintain a safe working environment;
- Exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the people and organisations we work with; and
- Take part in, or be the subject of, any sale, merger or takeover of all or parts of the Bupa business.

Marketing and preferences

- We may use your personal information to send you communications about developments at Bupa that are relevant to your potential career with us. We may send these by post, by phone, through social media, by email and by text. This is known as marketing.
- If you don't want to receive emails from us, you can click on the 'unsubscribe' link that appears in all emails we send. If you don't want to receive texts from us, you can tell us by contacting us at any time. Otherwise, you can always email us at recruit@bupa.com to update your contact preferences.
- You have the right to object to direct marketing and profiling (the automated processing of your information to help us evaluate certain things about you, for example, your personal preferences and your interests) relating to direct marketing. Please see the section about your rights for more details.





6. Legal Grounds

By law, we must have a lawful reason for processing your standard and special category personal information for the purposes listed in section 5. These are set out below.

Standard personal information:

- It is necessary to meet the obligations set out in a contract or to take steps before entering into a contract;
- It is in our own or a third party's legitimate interests (see section 7 for more details); or
- We have to or are allowed to do so by law (for example, in line with employment and social security laws or to comply with requirements from our regulators).

Special category information:

- It is necessary for carrying out our obligations and exercising specific rights under employment, social security or social protection law (for example, we process health and disability and long-term health conditions information so that we can understand any reasonable adjustments we might need to make for you during the recruitment process or if you come to work for us, and we process information about your race, ethnic origin, sexual orientation, religion or philosophical beliefs to help us monitor equal opportunities);
- It is necessary in the vital interests of you or another person (for example, if you need medical attention at work and are unable to communicate or give your consent);
- You have obviously made that personal information public (for example, you publicly share sensitive personal information on social media);
- It is in the public interest, in line with local laws;
- It is necessary to establish, make or defend legal claims;
- It is necessary for the purposes of occupational medicine, including to assess whether you are able to work; and
- You provide clear and specific consent to take in certain psychometric assessments, such as online personality tests (please note, we don't need specific consent for all psychometric assessments).

Criminal offence information

For some roles we need to carry out criminal history checks, so we may process criminal offence information. Our legal ground for carrying out these checks depends on which part of the business you work in, but typically it is because it is necessary to keep to employment law or other legal requirements such as those under financial services legislation and legislation relating to protecting vulnerable groups. If you would like more information about the checks we carry out, you can ask your recruitment officer for a copy of our local *Employment Screening Policy and Candidate's Guide to Bupa Employment Check Standards*



7. Legitimate Interest

Legitimate interest is one of the legal reasons why we may process your personal information. Taking into account your interests, rights and freedoms, the types of legitimate interest which allow us to process your personal information include:

- To deal with your application and manage our relationship with you;
- To protect our (and our customers' and other people's) rights, property or safety, including to protect the health, safety and welfare of workers, and to maintain a safe working environment;
- To exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the people and organisations we work with; and
- To make sure you are ready to do your job.



8. Processing for profiling and automated decision making

Like many businesses, we sometimes use automation to manage our relationship more effectively. This will involve evaluating information about you and, in some cases, using technology to provide you with automatic responses or decisions (automated decisions).

You have specific **rights** relating to:

Profiling (automated processing of your information to help us evaluate certain things about you, for example, your personal preferences and your interests); and

Automated decision making (making a decision using technology, without any person being involved).

Profiling: For certain roles with us (for example, graduate positions and certain front-line roles in our Bupa Global business, such as sales advisers), we may ask you to take part in an online personality assessment to give us information about your personality type. We will let you know at the time if we want you to take part in these tests.

Automated decision making: We use technology to screen applications we receive for carer or support roles at our UK care homes to make sure we only accept applications from people who are eligible to work in the UK. If you tell us on your application that you are not eligible to work in the UK, we will automatically reject your application for that reason. If you would like us to have a member of our team review an automatic rejection of your application (for example, because you think you have been wrongly categorised as not being eligible to work in the UK), you can ask us to do this. You have the right to challenge automated decisions and to give us your point of view. If you want to do this, please contact us at dataprotection@bupa.com.



9. Sharing your information

We share your information, for the purposes set out in this privacy notice, with:

- Other members of the Bupa Group;
- Our agents (for example, our legal representatives, translators, interpreters and tax advisers in line with the law);
- Suppliers who help deliver products or services on our behalf or who give us advice (for example, suppliers providing background checks);
- Any corporate clients you provide services to onsite, if your role involves this;
- Doctors, clinicians and other healthcare professionals, hospitals, clinics and other healthcare providers to help with workplace health and safety;
- People or organisations we have to or are allowed to share your personal information with by law (for example, for fraud prevention or safeguarding purposes, including with the Care Quality Commission, and social security and tax offices, as well as financial regulators for our regulated entities); ~~and~~
- The police and other law enforcement agencies to help them perform their duties, or with others if we have to do this by law or under a court order; and
- If this applies, potential buyers of all or part of our business.

If we share your personal information, we will make sure appropriate protection is in place in line with data protection laws.



10. Transferring information outside the UK and the European Economic Area (EEA)

We deal with many international organisations and use global information systems. As a result, we transfer your personal information to countries outside the UK and the EEA (the EU member states plus Norway, Liechtenstein and Iceland), for the purposes set out in this privacy notice.

We take steps to make sure that, when we transfer your personal information to another country, appropriate protection is in place in line with data protection laws. Often, this protection is set out under a contract with the organisation who receives that information. For more information about this protection, please contact us at dataprotection@bupa.com.



11. How long we keep your personal information

We will keep your information for the period needed to meet our legal responsibilities. We use the following criteria to help us decide how long we need to keep your personal information for.

- Whether you take up employment or another arrangement with us, and the length of that employment or arrangement.
- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- Any periods for keeping information which are set by law or recommended by regulators, professional bodies or associations.
- Any time limits for making a claim.
- Any tribunal, court or other relevant proceedings that apply.
- How long it would be reasonable to expect you to reapply for a job or, if you are employed by us, to ask for a reference.

Generally, if your application is successful, we will keep your personal information for seven years after the date you leave your employment. If your application is unsuccessful, we will keep your information for 12 months after the end of the recruitment process for the role you applied for. At the end of the period, we keep your information for, we will securely and permanently delete your personal information. If you would like more information about how long we will keep your information for, please contact us at dataprotection@bupa.com.

We are committed to keeping your information secure and will store it in line with our *Enterprise Security Policy*. If you would like more information about this policy, you can ask your recruitment officer for a copy of it.



12. Your rights

Under European and UK data protection laws, you have the following rights relating to the information we hold about you in some computer and paper records.

- **Right of access:** You have the right to make a written request for details of the personal information we hold about you and a copy of that personal information.
- **Right to rectification:** You have the right to have inaccurate information about you corrected.
- **Right to erasure ('right to be forgotten'):** You have the right to have certain personal information about you deleted from our records.
- **Right to restriction of processing:** You have the right to ask us to use your personal information for restricted purposes only.
- **Right to object:** You have the right to object to us using personal information.
- **Right to data portability:** You have the right to ask us to transfer personal information you have given us to you or someone else in a format that can be read by computer.
- **Right to withdraw consent:** We do not normally rely on permission to allow us to process your personal information. We will only ask for your permission in very limited circumstances and, if we do so, we will make it obvious to you when we are asking for permission and what it is for. You have the right to withdraw any permission you have given us to handle your personal information. If you withdraw your permission, this will not affect the lawfulness of how we used your personal information before you withdrew your permission.

These rights may not apply in all cases. If we are not able to meet your request, we will explain why. If you make a request, we will ask you to confirm your identity if we need to, and to provide information that helps us to understand your request better. If you would like more information about your rights, or to exercise any of your rights, please contact us at dataprotection@bupa.com.



13. Data protection contacts

If you have any questions, comments, complaints or suggestions relating to this notice, or any other concerns about the way in which we process information about you, please contact our Data Protection Officer and Privacy Team at dataprotection@bupa.com.

You also have a right to make a complaint to your local privacy supervisory authority. Our main office is in the UK, where the local supervisory authority is the Information Commissioner.

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

Website: www.ico.org.uk Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

In Ireland, the local supervisory authority is the Data Protection Commission.

Data Protection Commission

Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland Website: <https://www.dataprotection.ie/>

Email: info@dataprotection.ie

You can also make a complaint with another supervisory authority which is based in the country or territory where:

- You live;
- You work; or
- The matter you are complaining about took place

