

Recruitment and Colleague Privacy Notice

The following privacy statement explains how we protect information about you which is gathered and processed by us before, during, and after your working relationship with us. It applies to all applicants, employees, workers, and contractors. We ensure the security of your personal data, and only authorised personnel have access to your personal information. Such personnel are required to maintain the confidentiality of this sensitive data.

Bron Afon Community Housing, Ty Bron Afon, William Brown Close, Llantarnam Industrial Park, NP44 3AB is the **Data Controller** and is ultimately responsible for ensuring the data you provide is kept secure, processed lawfully and that you understand your legal rights in relation to the data you provide. As part of our Data Controller responsibilities, we have an assigned Data Protection Officer (or equivalent).

What information do we collect about you?

Personal data, or personal information, means 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).

As part of the recruitment process and during your employment with us, we may collect the following about you (but not limited to):

- Identity data, including your name, title, address, email, telephone number, email address, date of birth, gender, and copies of your driving licence and passport, marital status and dependants, next of kin and emergency contact information,
- Work and recruitment information, including a copy of your CV, your start dates, leaving dates and reasons for leaving previous or your current employer, training records and professional memberships, location of employment or workplace, performance information, disciplinary and grievance information, copies of your right to work documentation, job titles, work history, references and other information which is included in a resume, CV, or cover letter as part of the application process, and results of HMRC employment status check,
- Electronic and visual data, such as CCTV footage, vehicle trackers and cameras and other information obtained through electronic means such as swipe card records, information about your use of our information and communications systems and photographs.
- Sensitive personal data, including information about your race or ethnicity, religious beliefs, sexual orientation and trade union membership. Information about your health, including any medical condition, health and sickness, and information about that condition needed to provide reasonable adjustments or access requirements. Information about criminal convictions and offences and the results of a Disclosure and Barring Service check (DBS check),

- Financial and tax information, including bank account details, payroll records, salary, bonuses, National Insurance number, pension and tax status information,
- Answers to questions around your recruitment preferences,
- Any other information you wish to provide in support of building up your candidate account.

How do we collect this information?

We may collect this information:

- When you create a profile on our careers platform, or
- When you apply for a role with us either directly or through a third party such as a recruiter or via a third-party platform or advert,
- During your interview or employment with us, and
- From other third parties, such as background check providers, former employers, or credit reference agencies.

Why do we collect this information (purpose)?

We only process your personal information if we have a legal basis for doing so.

This will primarily be to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal data where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests or where we need to protect your interests (or someone else's) interests or when you have provided your consent.

The following table identifies how and why we use your personal data.

Type of Personal Data	Use	Legal Basis
Name, telephone number, personal email address, username, password	To create and maintain your profile on our careers page.	Performance of a contract
Name, addresses, telephone numbers, and personal email addresses	To contact you about the success of your application and other subsequent necessary contact to administer a contract with you.	Performance of a contract
Name, addresses, copies of your driving licence and	To verify you in order for you to work with us, including whether	Performance of a contract, our

passport, results of HMRC employment status check, copies of right to work documentation, job titles, bank account details, payroll records, National Insurance number, right to work documentation. Information about criminal convictions and offences.	you are legally entitled to work in the UK.	legitimate interests and complying with a legal obligation
Name, address, bank account details, payroll records, National Insurance number	To compensate you for your work	Performance of a contract
Name, address, bank account details, payroll records, National Insurance number	Maintaining our internal business management, planning, accounting and auditing	Our legitimate interests
Payroll records, National Insurance number	To comply with our reporting and tax obligations	Complying with a legal obligation
Name, address, bank account details, payroll records, marital status and dependants, National Insurance number	To enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties	Complying with a legal obligation and consent
Name, address, health data, date of birth, gender, marital status and dependants, next of kin and emergency contact information	To assist you in the event of an emergency	Protection of your interests or someone else's and complying with a legal obligation
CCTV footage and photographs	To monitor the security of our premises	Our legitimate interests
Vehicle trackers and cameras	To provide a safe, reliable and effective vehicle fleet. To comply with health and safety and HMRC tax obligations	Our legitimate interests
Name, videos and photographs	To be included in our marketing material	With your consent
Health data	To comply with our health and safety obligations, providing appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions.	Complying with a legal obligation and protection of your interests or someone else's

Anonymised information about your race or ethnicity, religious beliefs, sexual orientation, sex/ gender, and trade union membership, information about your health and salary and criminal history information.	For our internal HR records to monitor diversity and equal opportunities.	Our legitimate interests and complying with a legal obligation
Name, swipe card records, information about your use of our information and communications systems and photographs.	To monitor your use of our information and communication systems to ensure compliance with our IT policies.	Our legitimate interests
Information about your use of our information and communications systems and photographs.	To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.	Our legitimate interests

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Who might we share your information with?

We may share your personal data with third party service providers, including for the purposes of recruitment, learning management, and payroll services.

Personal information processed for the above purposes, may be shared with our processors, such as our service providers, and other third parties, such as HMRC, our group companies, or other entities in the context of our restructuring.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

This may involve transferring your data outside the UK. Whenever we transfer your personal data out of the UK, we ensure that appropriate safeguards are in place which afford you a similar degree of protection, such as ensuring we have carried out appropriate due diligence on our processors, and having protective contractual arrangements in place with them.

How long do we keep hold of your information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting



requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention and Disposal Policy which is available on our intranet.

Your candidate account will be deactivated after 6 months of inactivity. You can deactivate your account at any time. At the same time as this, your data will be fully anonymised.

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 (as it will no longer be personal data). Once you are no longer an employee, worker, or contractor of Bron Afon, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

How can I access the information you hold about me? Your rights

Visitors who choose to register on our recruitment platform may access their profile, correct and update their details, or withdraw their details at any time. In all cases we will treat requests to access information or change information in accordance with applicable legal requirements.

In certain circumstances, you have the following rights regarding your personal data:

- the right of erasure or to be forgotten,
- the right to rectification if information is inaccurate or out of date,
- the right of data portability (to obtain and reuse your personal data),
- the right to object to certain types of processing,
- the right to withdraw your consent with regards to the handling of your personal data,
- you have the right to ask for a copy of the information we hold about you (Subject Access Request - S.A.R),
- You have the right to lodge a complaint with a supervisory authority - the ICO.

If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure or by referring the matter to the Information Commissioner (www.ico.org.uk).


Information Security

We have in place appropriate technology and operational security measures along with internal policies and procedures to protect all personal information we process from loss, misuse, alteration, destruction or unauthorized access.

Changes to our Privacy Notice

We may publish a revised Privacy Notice on our intranet and website from time to time.

This Privacy Notice was last updated April 2026.

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