

Royal Household Applicant Privacy Notice

This privacy notice is designed to inform you how the Royal Household Applicant process collects, processes, shares and stores your personal data for the purpose of processing an application made by you for a job vacancy.

What information do we collect?

As part of the recruitment process we collect and process a range of personal and sensitive data about you. The data we collect when you submit an application form includes:

- Your name, address, telephone numbers and email addresses.
- Your gender, date of birth, marital or civil partnership status
- Your National Insurance number and bank details
- Evidence of how you meet nationality rules, your right to work in the UK and immigration status, such as passport, visas, nationality details and driver's licence
- Photographs of you, details in your application form and/or CV and employment/character references

Special Category and sensitive personal data

During the course of the recruitment and selection process you may choose to share details on the following information with us:

- Disability
- Pregnancy/Maternity
- Race or ethnicity
- Religious beliefs
- Sexual orientation
- Gender re-assignment
- Political opinions
- Trade union membership
- Physical and mental health data, such as medical conditions and sickness records, which may include genetic and biometric data
- Socio-economic background, such as type of school attended, parents' highest qualification and main job

Criminal conviction data

We only collect information about criminal convictions or allegations of criminal behaviour:

- where it's appropriate to your role
- if it's legally possible to do so
- as part of the recruitment and onboarding process

If you are a successful applicant, on occasions we will ask you to provide information of third parties, for example:

- Your emergency contact, pension and life insurance beneficiaries, your family members (as part of our security checks) and your referees.

How is it collected?

Your personal data is usually provided to us by you either directly or through our third party supplier. The data is collected in different ways:

- In emails you send us;
- In information you enter onto our online recruitment portal;
- In forms you complete and send to us.

We sometimes collect information from third parties including:

- Former employers
- Credit reference agencies or other background check agencies
- Doctors, medical and occupational health professionals
- Disclosure Barring Service
- United Kingdom Security Vetting
- UK Visas and Immigration
- Consultants and other professionals who advise us

How is it stored?

Your personal data is stored in a number of ways:

- On our online recruitment portal
- In emails we exchange with you
- In a restricted access HR electronic folder on our secure IT network
- On our HR database
- Our security database
- Our visitor registration system

How do we use your personal data?

We process your data in order to:

- Allow you to be able to apply for vacancies at the Royal Household.
- Check you are legally entitled to work in the UK
- Take you through our security and vetting procedures (if you are invited to an interview or are a successful applicant).
- Make a decision about your recruitment or appointment, such as assessing qualifications for a role, using psychometric testing.
- Check your driver's licence record to confirm your eligibility to drive a Household vehicle or to use your own vehicle for business purposes (if relevant).
- Monitor trends in our recruitment processes which inform our decision-making.

How do we use special category personal data?

We may use your more sensitive personal data to:

- Carry out our legal obligations or exercise employment-related legal rights
- Carry out our statutory duties and/or regulatory requirements
- Prevent or detect unlawful acts
- Protect your vital interests or those of another person
- Process legal claims

How do we use criminal conviction data?

We will use information about criminal convictions or allegations:

- To make decisions regarding suitability for the role

We may process personal data relating to criminal convictions and offences or related security measures to:

- meet our legal obligations, such as employment law
- exercise our employment-related legal rights
- to protect your interests or those of another person

We rely on the processing conditions in the Data Protection Act 2018 which relate to processing of criminal conviction data for employment and statutory purposes.

Who will it be shared with?

We may need to share your data with and/or obtain information from some third parties:

- Our HR system suppliers
- Internal and external interview panellists and advisors
- The UK Government Home Office for security clearances
- Our legal representatives e.g. solicitors
- Your previous employers and/or academic institutions for a reference

If we think that from your application your skills and experience might make you a suitable applicant for other roles within the Royal Households, we may share your application details on a strictly confidential basis with the recruitment team responsible for the vacancy.

How do we protect your data?

We take the security of your data very seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by employees in the proper performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions. They are also under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data in line with the relevant legislation. We do not allow third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for purposes we have specified.

How long do we keep it?

Your application account is active as long as you choose it to be, but your application forms are kept for two years before being deleted.

If you attend an interview but are not successful, your interview notes will be destroyed after six months.

If you are successful, your interview notes will be placed on your employee file when you start and your on-boarding paperwork is either kept until six years after your employment ends or is sent to the Royal Archives in line with our retention schedules.

The legal bases for processing your personal data

If you have applied for one of our vacancies, we process some of your information because you have given us your **consent**. If the basis for collecting and processing your data is based on your active consent, you also have the right to withdraw that consent at any time (and if you do, we will inform you of any consequences of doing so).

If you are a successful candidate, we process your personal data in order to take steps at your request to enter into an employment **contract** with you.

Other times we collect the data because we believe it is a **legitimate interest** of the organisation to process the information e.g. we collect information on your protected characteristics so we can monitor and improve diversity in the applicant process and in our employee profile across the organisation.

Special Category Data

In addition to the above legal bases, we must have further justification for processing your special category personal data. We may process this data:

- to carry out our obligations and exercise our rights in the recruitment and selection process
- to protect your vital interests or those of another person where you are incapable of giving your consent
- to establish, exercise or defend legal claims
- for reasons of substantial public interest, with a basis in law
- to archive items that are in the public interest

We rely on the processing conditions in the Data Protection Act 2018 which relate to processing of special category data for employment, statutory and regulatory purposes.

What are my rights?

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- ask us to change incorrect or incomplete data;
- ask us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing
- ask us whether we use automated decision making or profiling when processing your data.

Please note that none of these rights are absolute and we reserve the right to refuse your request where exceptions apply.

Contact information and further advice

The Keeper of the Privy Purse is registered with the Information Commissioner's Office as the Data Controller for The King's Household, and the Private Secretaries to the other Members of the Royal Family are the registered Data Controllers for their Households. The Director of the Royal

Collection is the Data Controller for The Royal Collection Trust and Royal Collection Enterprises Limited.

If you would like to contact the Information Assurance team please email: privacy@royal.uk

If you have concerns about the use of your personal data, the Information Commissioner's Office is an independent body set up to uphold information rights in the UK. They can be contacted through their website: www.ico.org.uk or their helpline on 0303 123 1113, or in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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