

CitNOW GROUP

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Candidate Privacy Policy

GROUP CANDIDATE PRIVACY POLICY

1. Policy Statement

As part of our recruitment process, CitNOW Group collects and processes personal data relating to candidates. CitNOW Group is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

2. Lawful basis of processing

Under the General Data Protection Regulation (GDPR) a company processing data must have a Lawful Basis for processing the data they hold. CitNOW Group meets this requirement by having a legitimate interest in processing personal data during the recruitment process. Processing candidate's data enables the CitNOW Group to manage the recruitment process and to assess and confirm a candidate's suitability for employment, the organisation may also need to process data from job applicants to respond to and defend against legal claims.

3. Information we collect

Data will be stored securely by the HR Team, with access granted to the Hiring Manager for the purpose of the recruitment process only. Candidate information collected, may include:

- Name, address and contact details, including email address and telephone number;
- Details of qualifications, skills, experience and employment history;
- Information about current level of remuneration, including benefit entitlements;
- Whether or not a candidate has a disability for which the CitNOW Group needs to make reasonable adjustments during the recruitment process;
- Information about a candidate's entitlement to work in the UK

CitNOW Group collects this information in a variety of ways including but not limited to application emails, CVs, screening calls and interviews. Recruitment agencies also regularly provide personal data, primarily in the form of candidate CVs.

CitNOW Group will also collect personal data about its successful applicants from third parties, such as references supplied by former employers. CitNOW Group will only seek information from third parties when a job offer has been made and accepted using the reference details provided by the candidate.

4. Use of your information

CitNOW Group will use the personal information collected about a candidate to:

- Assess their skills, qualifications, and suitability for the work or role
- Carry out reference checks, where applicable
- Communicate with the candidate about the recruitment process
- Keep records relating to the company's hiring processes
- Comply with legal or regulatory requirements

In some cases, CitNOW Group needs to process data to ensure that it is complying with its legal and regulatory obligations. For example, it is required to check applicant's eligibility to work in that region/country before employment starts.

In the event a candidate is unsuccessful in their application, the CitNOW Group may keep a candidate's personal data on file for up to 12 months to share any future employment opportunities. All candidates are free to withdraw their consent to this retention of data at any time.

5. Disclosing your information

A candidate's information will be held by the HR Team and shared internally with Hiring Managers for the purposes of the recruitment exercise.

CitNOW Group will not share a candidate's data with third parties, unless their application for employment is successful and an offer of employment is accepted. The organisation will then share the candidate's data with former employers to obtain references.

The organisation will not transfer candidate data outside the European Economic Area unless the successful applicant is based outside of the EEA.

Candidates are under no statutory or contractual obligation to provide data to CitNOW Group during the recruitment process. However, without this information, CitNOW Group may not be able to process the application.

6. Storing and destroying your personal data

The organisation takes the security of candidate data seriously. It has internal policies and controls in place to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by employees in the proper performance of their duties.

If a candidate's application for employment is unsuccessful, the organisation will hold their data on file for up to 12 months after the end of the relevant recruitment process. At the end of that period, or in the event consent is withdrawn, data is deleted or destroyed.

In the event a candidate is successful, personal data gathered during the recruitment process will be transferred to the personnel file and retained during employment.

The periods for which data will be held and how employee data is stored, will be provided in a new privacy notice.

7. Your data protection rights

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

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- Ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

8. Contact us

If you would like to exercise any of these rights, please contact our Data Protection Officer at dpo@citnowgroup.com.

9. Contact authorities

If you believe that the organisation has not complied with your data protection rights, you can complain to the relevant authorities within your country/region.

10. Automated decision-making

Recruitment processes are not based solely on automated decision-making.

Reviewed: June 2025

To be reviewed: June 2026