Falck	Always check on-line for validity. **Privacy Commitment to Job Applicants**				Level:
Document users: **FalckUK-AMB**	Editor: **claire.ward**	Responsible: **HeadHSEQ**	Document number: **57810**	Version: **1**	Approved by: **claire.ward 15.10.2018**

1) Introduction

1.1 As an employer, Falck UK Ambulance Service Limited (Falck UK) acts as data controller for certain personal data about job applicants.

1.2 Falck, as a data controller and processor, has a duty to protect the personal data we process about our patients. If you are interested you can read more about the framework for controlling and processing personal data in our General Data Protection Regulation (GDPR) Policy, and Falck Group's Personal *Data Protection Policy* and *Information Security Policy*. As part of this framework we have a suite of information governance, information technology (IT), and records management policies, and have accreditation for ISO 27001: Information Security.

1.3 This privacy commitment describes our processes for collecting, holding, using and transferring of the personal data of our job applicants. Together with our commitment to patients, this document sits within our framework of information governance policies and processes and is overseen by the Head of Health Safety Environment and Quality (HSEQ), with support from our IT services provider.

1.4 This commitment defines, to our job applicants, our responsibility for protecting their personal data in accordance with the European Union (EU) General Data Protection Regulation (GDPR), effective from May 2018. Consequently, it is worded in terms that express these responsibilities.

1.5 Personal information, held about you, will not be shared, sold or disclosed in any manner other than as described in this privacy commitment.

1.6 In accordance with our Governance Framework, our privacy commitment to job applicants, employees and patients, and all other information governance policies will be reviewed and audited annually by the HSEQ Team to ensure fitness for purpose and compliance annually by the HSEQ Team.

2) Responsibilities

2.1 The Data Protection Officer (DPO) for Falck Group is Birgitte Poulson, who may be contacted at dpo@falck.com or +45 30 50 18 46.

2.2 Responsibility for GDPR compliance in the United Kingdom is delegated to the Director of Quality & Operations; who has responsibility for the administration and implementation of Falck UK's *GDPR Policy*.

2.3 These executive responsibilities are delegated to the Head of HSEQ. Therefore this commitment, which was prepared by Falck Group, was modified for Falck UK by the Head of HSEQ. Future reviews will also be conducted by the Head of HSEQ.

3) Procedures

3.1 Statement to job applicants

3.1.1 You are required to provide personal information to enable Falck to enter into a recruitment relationship with you. If you do not provide the necessary requested information you will not be able to be considered for a role with Falck.

3.1.2 Further if any of our processing is dependent upon your consent you have a right to withhold or withdraw such consent, which means that the information can no longer be processed by Falck, unless the processing can be based on another legal basis. The withdrawal of the consent, will not affect the processing already incurred prior to that withdrawal.

3.1.3 However, you need to be mindful of your obligation, as a job applicant, to provide relevant personal data, relevant to your role, e.g. we require a Disclosure and Barring Service check, and our consequential ability to terminate your application should you fail to provide necessary information.

3.1.4 You have, with the limitations of the legislation, among other things right to access your personal data, right to rectify incorrect information, right to deletion of information, right to limit information, right to data portability and right to object to the processing of personal data, including automated, individual decisions. You also have a right to lodge a complaint with the supervisory authority [DA: Datatilsynet.]

3.2 Collection of information

3.2.1 Personal data, which is held in accordance with our recruitment policies and processes, held about you may include:

- Name, address, e-mail address and telephone number
- Identity information, including national insurance number

- Personnel administrative information, such as education and qualifications, course, competence profile, job wishes
- References
- Professional memberships
- Health information

3.2.2 In your job applicant file we also store your application, and other relevant information. It is essential that appropriate changes to this data are recorded and it is imperative that you, as a job applicant, apply any changes to the data we may hold.

3.2.3 There may also be situations where we handle information that is not listed in the list above. We may collect and process personal data for the following purposes:

- To ensure necessary and relevant information in relation to the recruitment process, including the evaluation of the candidate
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (e.g. GDPR), including:
- Documentation requirements
- Compliance with legal obligations and best practice principles for processing of personal data
- Implementation and maintenance of technical and organisational security measures, including but not limited to, preventing unauthorized access to systems and information, prevent receipt or distribution of malicious code, termination of denial-of-service-attacks and damage to computer systems and electronic communication systems
- Investigation of suspected or known security breaches and reporting of such breach to individuals and authorities
- To process and respond to requests and complaints from data subjects and others
- Handling of inspections and requests from authorities
- Management of disputes with data subjects and third parties.

3.3 Automated, individual decision making

3.3.1 Personal data is not used for automated, individual decision making or profiling.

3.4 The legal basis for processing the personal information

3.4.1 The legal basis for processing of general and sensitive personal data as outlined above is the potential employment contract (cf. article 6(1)(b))

3.4.2 The legal basis for processing potential personality tests are is consent (cf. article 6(1)(a))

3.4.3 Please refer to the Checklist - Legal basis for processing personal data in our *GDPR Policy*

3.5 Disclosure of personal information

3.5.1 Personal information collected by Falck UK will be disclosed to and shared with the following recipients:

- Government departments
- External and internal audit

3.6 Special category data

3.6.1 We will pay particular regard to the security of personal data defined as special category data under GDPR, which may include:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health

- sex life
- sexual orientation

3.7 Transfer of personal information to data processors

3.7.1 We transfer your personal data to certain suppliers, e.g. IT suppliers, who process the information on behalf of Falck.

3.7.2 Transfer of personal data to recipients in countries outside European Union (EU)/European Economic Area (EEA)

3.7.3 We transfer your data to recipients in countries outside EU/EEA as we use an external supplier to host/store the above mentioned personal information. The basis for the international transfer is EU's "Standard Contractual Clauses" for transfers from data controllers to data processors in countries without an adequate level of protection outside EU/EEA. The standard agreement is available in different languages via this link:
https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087

3.7.4 Please refer to the Checklist - International transfers of personal data in our *GDPR Policy*

3.7.5 Further information about data providers and transfers to recipients outside the EU/EEA can be obtained from the Head of Health Safety Environment and Quality at the relevant recruitment email address (emsrecruitment@medicalservicesuk.com or ptsrecruitment@medicalservicesuk.com).

3.8. Retention periods

3.8.1 We retain your personal data as long as necessary in order to fulfil the above stated purposes. Personal data related to a recruitment process will be deleted after 6 months, unless you consent to prolong the retention period. If you are employed, a different retention period will apply, however personal data will not be retained longer than 5 years after resignation unless there are other requirements in applicable legislation.

3.9. Contact details

3.9.1 If you have any questions or comments with respect to the processing of your personal data or you wish to exercise your rights under applicable legislation, please contact Lezli Feeney, Head of Health Safety Environment and Quality [lezli.feeney@medicalservicesuk.com]. You may also contact our global group data protection officer by emailing to dpo@falck.com or by writing to:

Falck [Danmark] A/S

Polititorvet 1

1780 København V

Date: 18 April 2018

4) Related policies/procedures

Information Governance Policy

Information Security Policy

Records Management Policy

Registrations Policy

General Data Protection Regulation Policy (GDPR)

5) References

6) Appendices

18908 Registrations Policy including Complaints, Incident Reporting, Significant Events and Serious Incidents and Duty of Candour

19112 General Data Protection Regulation (GDPR) Policy

19125 Information Governance Policy

32203 Information Security Policy

38092 Records Management Policy including Clinical Records

18908 Registrations Policy including Complaints, Incident Reporting, Significant Events and Serious Incidents and Duty of Candour
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