

## KPIC RECRUITMENT PRIVACY NOTICE

### GENERAL DATA PROTECTION REGULATION (GDPR)

#### What Information We Collect About You as a Candidate for Employment

Data Protection laws protect all personal information, which the Company holds, about its prospective employees (Data Subject). We take our responsibilities under these laws seriously. The Company may collect and hold some or all of the following personal data about the data subject during the recruitment process: name, address, date of birth, PPS, P45, marital status, educational or previous employment background, qualifications, employment history and details of current position, curriculum vitae's, applications and interview records, references, records of disciplinary investigations / meetings or grievances, pension and other insurance documentation, vetting results, competency test results and payroll details.

#### Contact Details

The Firm are the Data Controller which means that we collect personal data from you ("Data Subject") as our prospective employee.

The Firm can be contacted as follows:-

**Address:** Father Mathew Hall, 131 Church Street, Dublin 7

**Email:** [info@Keaneinvestments.com](mailto:info@Keaneinvestments.com)

**Website:** [www.keaneinvestments.com](http://www.keaneinvestments.com)

**Phone no.:** +353 1 828 0080

If you wish to discuss any aspect of our Recruitment Data Privacy policy please speak to your recruiter in the first instance or email us at: [dataprotection@keaneinvestments.ie](mailto:dataprotection@keaneinvestments.ie).

See our website for our full Privacy Notice, [www.keaneinvestments.com](http://www.keaneinvestments.com).

#### Purpose of the Processing

Data subject information is required for recruitment and vetting of suitable candidates for employment purposes. It is processed for the purposes of carrying out interviews, producing offer/decline letters, management and administration of the prospective employees' contract of employment and to protect the prospective employees' rights under various employment laws which applies to all prospective employees. All data is held in confidential and secure files.

#### Legal Basis for Processing

The Company may, from time to time, process personal data about the data subject for the following purposes and/or usage:

#### Contract of Employment

In general our legal basis for processing data subject's personal data is in anticipation of entering into an employment contract. In other instances it is to comply with a legal obligation under employment, regulatory, taxation or company law. For preparing the prospective employees' Terms and Conditions of Service and generally for the administration and management of their prospective employment with the Company.

## Recruitment activities

As part of our activities in recruitment we may carry out the following:- Administration and vetting of CVs, references, advertising and posting on job sites, interviews, selection processes. The personal data collected and processed under this activity will be processed in the legitimate interests of the company in pursuing a business and on the basis of anticipated pre-contractual enquiries.

## Interview Records

The Organisation will retain records of interview notes, application forms etc. in order to ensure compliance with the Employment Equality Acts, 1998 and 2015 and with the company's Equal Opportunities Policy for at least 1 year from the date that the position was filled.

## Recipients of the Data We Collect From You

Data subject's personal data will be shared as follows:

| <b>INTERNAL</b>                          | <b>EXTERNAL</b>                   |
|------------------------------------------|-----------------------------------|
| Directors                                | Recruitment consultants           |
| Senior Managers, Direct line supervisors | External advisors, e.g. legal     |
| Accounts Department                      | External accountants              |
| Compliance Department                    | Employment tribunals as requested |

## Data Subject Rights

- Right to access personal information held by any firm
- Right to have inaccurate data corrected
- Right to have information erased
- Right to object to the processing or to restrict the processing of your data
- Right to have your personal information sent to you or another firm
- Rights around automated decision making and profiling

## Record Retention

Data subject's personal information will be retained on file for 1 year. Where the data subject becomes an employee please note that data will be held for longer periods under their terms of employment.

## Complaints

You have a right to make a complaint to the Data Commissioner if you are unhappy with our privacy policy. Contact details are as follows:-

**Phone:** +353 57 868 4800  
**Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)  
**Website:** [www.dataprotection.ie](http://www.dataprotection.ie)

**Date: 16 May 2018, V.1**