

Miller Homes

Recruitment privacy notice

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share data about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal data about you.

Who collects the data

Miller Homes Limited ('Company') is a 'controller' of personal data and gathers and uses certain data about you. This data is also used by our affiliated entities and group companies (our 'group companies') and so, in this notice, references to 'we' or 'us' mean the Company and our group companies.

About the data we collect and hold

The table set out in Part A of the schedule below summarises the data we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the schedule below summarises the additional data we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our data collection and processing is always proportionate. We will notify you of any changes to data we collect or to the purposes for which we collect and process it.

Where data may be held

Data may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above.

How long we keep your data

We keep the personal data that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your data will depend on whether your application is successful and you become employed by us, the nature of the data concerned and the purposes for which it is processed.

We will keep recruitment data (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised (this is a process in which information that relates to a particular person, for example, a name or email address, is changed to a number or name that has no meaning), and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment data that is necessary in relation to your employment.

If your application is unsuccessful, we will keep your personal data as set out below in each of the tables in the Schedule.

Your right to object to us processing your data

Where our processing of your data is based solely on our legitimate interests (or those of a third party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your data unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact our Data Protection Manager by emailing Miller Homes at DPOffice@miller.co.uk if you wish to object in this way.

Your rights to correct and access your data and to ask for it to be erased

Please contact our Data Protection Manager by emailing Miller Homes at DPOffice@miller.co.uk if (in accordance with applicable law) you would like to correct or request access to data that we hold relating to you or if you have any questions about this notice. You also have the right to ask for some but not all of the data we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Manager will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach if we are legally required to do so.

How to complain

We hope that our Data Protection Manager can resolve any query or concern you raise about our use of your data. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

THE SCHEDULE - ABOUT THE DATA WE COLLECT AND HOLD

Part A - Up to and including the shortlisting stage

The data we collect	How we collect the data	Why we collect the data (purpose)	Legal basis for processing	How we may share the data
Your name and contact details (i.e. address, home and personal mobile phone numbers, personal email address)	From you or from a recruitment agent	To contact you by letter, email, or phone where necessary to progress your application, arrange interviews and inform you of the outcome at all stages To inform the relevant manager or department of your application	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	With HR personnel, the relevant regional office or group company or the manager of the relevant department, to enable them to contact you
Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests	From you, or from a recruitment agent, in the completed application form, in the completed psychometric test (if applicable) and interview notes (if relevant)	To make an informed decision about which candidates to shortlist for interview and ultimately recruit	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	With the manager of the relevant department and, if you are invited for an interview, the interviewer(s). If any of your data is received by way of psychometric testing, the data will be pseudonymised
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our equal opportunities monitoring obligations and to follow our policies	To comply with our legal obligations and for reasons of substantial public interest (equality)	For further information, see * below Table B
Details of your referees	From your completed application form	To obtain a reference, so that we can make an informed decision about your recruitment	Legitimate interest: to carry out a fair recruitment process	Data shared with relevant managers, HR personnel and the referee

If your application is unsuccessful at this stage, we will keep your application, CV and interview records for 12 months after the end of the month in which your application was received. We will also keep your data for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

Part B
Before making a final decision to recruit

The data we collect	How we collect the data	Why we collect the data (purpose)	Legal basis for processing	How we may share the data
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers**	From your referees (details of whom you will have provided)	So that we can make an informed decision about your recruitment	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications **	From you, from your education provider, from the relevant professional body	To make an informed recruitment decision	Legitimate interest: to verify the qualifications information provided by you	Information shared with relevant managers and HR personnel
Data regarding your criminal record, in a standard or enhanced criminal records certificate as appropriate**	From you and from the Disclosure and Barring Service (DBS) or Disclosure Scotland or through our third-party screening provider	To make an informed recruitment decision To enter into/perform the employment contract To carry out statutory checks in accordance with our legal obligations	Legitimate interest: to verify the criminal records data provided by you For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty)	Information shared with our third-party screening provider, DBS and other regulatory authorities as required For further information, see * below

The data we collect	How we collect the data	Why we collect the data (purpose)	Legal basis for processing	How we may share the data
Data regarding your financial/credit history	From you, from our third-party screening provider and from the relevant financial institution	To make an informed recruitment decision	Legitimate interest: to make an informed decision to recruit For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty)	Information shared with our third-party screening provider, and other regulatory authorities as required
Data regarding your social media history	From you, from our third-party screening provider and from the relevant social media platform	To make an informed recruitment decision	Legitimate interest: to make an informed decision to recruit	Information shared with our third-party screening provider
Your nationality and immigration status and data from related documents, such as your passport or other identification and immigration information **	From you and, where necessary, the Home Office	To enter into/perform the employment contract To carry out right to work checks in accordance with our legal obligations	Legitimate interest: to maintain employment records To carry out obligations and exercise rights in employment law For reasons of substantial public interest (preventing or detecting unlawful acts)	Information may be shared with the Home Office
Where required for the relevant position: copy of your driving licence**	From you	To make an informed recruitment decision To ensure that you have a clean driving licence To enter into/perform the employment contract	Legitimate interest: to ensure you can legally drive Legitimate interests: to ensure you are fit to perform the duties To carry out obligations and exercise rights in employment law	Information may be shared with our insurer

The data we collect	How we collect the data	Why we collect the data (purpose)	Legal basis for processing	How we may share the data
		To comply with our legal obligations To comply with the terms of our insurance	For reasons of substantial public interest (preventing or detecting unlawful acts)	
Data relating to your health**	From you and/or your medical practitioner	To determine if any workplace adjustments are necessary To make an informed recruitment decision To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	Legitimate interests: to ensure you are fit to perform the duties For the purposes of obligations and rights in employment and social security law	Information may be shared with our insurer

If your application is unsuccessful at this stage, we will keep your application, CV and interview records for 12 months after the end of the month in which your application was received. We will also keep your data for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

* Further details on how we handle special category data and data relating to criminal convictions and offences are available from our HR department.

** You are required (by law or in order to enter into your contract of employment) to provide the categories of data marked ** above to enable us to verify your right to work and suitability for the position.