

# Severn Trent candidate privacy policy

Updated: July 2018

# Severn Trent Candidate Privacy Policy

## Introduction

It's really important that we protect the personal data that you trust us with. The "small print" of privacy statements can seem complicated so that's why we've created this data promise setting out the three key principles that we will live by.

The three principles that we apply to when handling data relating to candidates within our business and supply chain partners are:

1. We always have you in mind and will use your data to continually improve the benefits and culture we all work in
2. We will set out our privacy policy clearly to explain what data we hold, how we use it, and who we share data with. You'll find a link to our privacy policy on this webpage.
3. We will keep your data secure, making sure that only those individuals that have need for specific personal data, such as health information, can access it

## Purpose of this Candidate Privacy Policy

This candidate privacy policy ("**Policy**") provides information about the privacy practices for Severn Trent ("**Severn Trent**", the "**Company**", "**we**", "**us**" or "**our**") and sets out what personal information we process about you, the reasons for this processing and the basis for it, whether you are a prospective employee, contractor or temporary worker of the Company. Severn Trent includes the following - Severn Trent Plc, Severn Trent Water Limited, Severn Trent Services Operations UK Limited, Severn Trent Retail & Utilities Services Limited and Hafren Dyfrdwy Limited.

**"Personal data"** is information from which an individual can be identified, either on its own or when combined with information already held or likely to be held by us.

We are the data controller of your personal data, meaning we determine how and why it is processed (used), in accordance with applicable UK data protection laws, including the Data Protection Act 2018 and General Data Protection Regulation (Regulation (EU) 2016/679).

Our data protection officer can be contacted at [dataprotection@severntrent.co.uk](mailto:dataprotection@severntrent.co.uk)

If you have questions or concerns regarding this policy or the processing of your personal data by us, please contact us using the email: [dataprotection@severntrent.co.uk](mailto:dataprotection@severntrent.co.uk)

You can contact us to update your personal details on 02477 716790.. Please note that your telephone calls may be recorded and may be monitored for training and quality purposes.

## The personal data we collect about you

We collect and process personal data about you that we have either received directly (for example, contact details provided by you during the course of your recruitment or indirectly by way of third parties (for example, a copy of your CV provided by a recruiter engaged by you).

When you apply to work for us, we may process the following categories of data:

- your name;
- your date of birth;
- your gender;
- your contact details, including postal address, telephone number and email address; and
- information provided within your CV (including information such as employment and educational history, nationality, languages spoken, national insurance number, emergency contact details, signature)
- criminal records (if justified for the role you are being considered for);
- a reference from former employers;
- your log in details and password if you are invited to log on to a website;
- information provided within job applications, emails and letters, during telephone calls and through our websites/social media accounts;
- information we receive from other organisations such as credit reference agencies and fraud prevention agencies.

Further details on the data fields collected and their lawful basis are set out on page six.

We may convert your personal data into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from that data. We may use this aggregated data to conduct research and analysis, including to produce statistical research and reports. We may share such anonymous aggregated data with third parties. Aggregated and anonymous information does not personally identify you and is therefore not personal data.

**Severn Trent owns critical national infrastructure and national infrastructure. Some roles require security clearance through the Government provider of UK, United Kingdom Security Vetting (UKSV). Personal information requested by UKSV must not be withheld but will not be stored or processed by Severn Trent.**

## Sharing your information

Where lawful to do so, we may share your personal information with the following recipients:

- members of the Severn Trent Group (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006), for the administration for your employment (or other) relationship with us and our group;
- members of the Severn Trent Group or other third parties that provide services to us where those services assist in the processing of your personal data for the purposes described above (including, for example, the provisions of candidate checks). Such disclosures will be on the lawful basis of it being in our legitimate interest (such third parties will include service providers for candidate checks);
- governmental and regulatory bodies and other third parties where required to do so by applicable law, such as to comply with a court order or a request from a regulator or similar legal process or where otherwise necessary to comply with a legal obligation or for the administration of justice. Such

disclosures will be on the lawful basis of it being in our legitimate interest and/or necessary to comply with legal obligations.

## Do we transfer your personal data to other jurisdictions?

Your personal data may be sent outside the European Economic Area (EEA), but only once we have implemented appropriate technical and organisational measures to protect your personal data in the form of standard data protection clauses. If you would like to obtain a copy of the standard data protection clauses please contact us using the details above.

## Keeping your personal data

We will retain your personal data for as long as is necessary for the purposes for which it was collected, as notified to you. This shall include the following retention periods:

**In relation to applicants** – for the duration of the application process and, if you are successful, in accordance with the retention periods cited below or, if you are unsuccessful, for up to 12 months in order to keep a record of your application, respond to any questions from you and/or invite you to apply for any other roles that should become available.

### Your rights in relation to our use of your personal data

You may withdraw your consent to receiving direct marketing at any time by writing to us or emailing [HR@severntrent.co.uk](mailto:HR@severntrent.co.uk)

### We also offer the following controls:

1. You may request access to or copies of the personal information that we hold about you. If you would like to exercise this right, please contact us at [employeeSAR@severntrent.co.uk](mailto:employeeSAR@severntrent.co.uk) or the address below. We may charge in some circumstances, for example, the provision of additional copies;
2. If you believe that any information we have about you is incorrect or incomplete, please contact us on 02477 716790 or [HR@severntrent.co.uk](mailto:HR@severntrent.co.uk) as soon as possible. We will take steps to seek to correct or update any information if we are satisfied that the information we hold is inaccurate. You may request that we restrict our processing until it is corrected;
3. You may request that your personal information be deleted, where it is no longer necessary for the purposes for which it is being processed and provided there is no other lawful basis for which we may continue to process such information;
4. If we are processing your personal information to meet our legitimate interests (as set out above), you may object to the processing of your personal information by us. If we are unable to demonstrate our legitimate grounds for that processing, we will no longer process your personal information for those purposes;
5. If you have objected to our processing as set out above;

6. You may withdraw any consent given to processing (this will not affect the lawfulness of processing based on consent before its withdrawal); or

You may also request that we restrict the processing of your data to that to which you have consented or for the establishment, exercise or defence of legal claims or the protection of the rights of another person, whilst we verify your data as set out in point 2 above; pending verification of our legitimate grounds as set out in point 4 above; or if the processing is unlawful or no longer necessary, but you wish us to retain your data for the purposes of establishing, exercising or defending legal claims.

Please contact us if you would like to exercise any of these rights or if you have any concern about how your personal information is processed at [dataprotection@severntrent.co.uk](mailto:dataprotection@severntrent.co.uk) and we will try to resolve your concerns.

However, if you consider that we are in breach of our obligations under data protection laws, you may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>). You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of an alleged infringement of the GDPR.

## Updates to this Policy

We may update this Policy to reflect changes to our information practices. If we make any changes we will notify you directly or update you by means of a policy on the website. We encourage you to periodically review the website for the latest information on our privacy practices and this Policy.

## Contact Information

If you have any questions about this Policy, your use of the Website, our Services or your dealings with us, in relation to our use of your personal data, you can contact us via the following contact details:

- email us at [dataprotection@severntrent.co.uk](mailto:dataprotection@severntrent.co.uk)
- OR
- write to us:  
FAO Data Protection Officer  
2 St John's Street,  
Coventry,  
CV1 2LZ

## Candidate consent

I confirm that all the statements made and information submitted as part of my application for a position with Severn Trent are correct.

I understand that in order to qualify for employment, I will be required to give Severn Trent my express consent to permit it to conduct external checks on me (as and when required) to confirm any of the statements I have made or information that I have submitted.

I understand that if I make a false declaration Severn Trent may take steps to terminate my employment, in accordance with its internal rules and procedures. If you proceed with your application, you have given consent to the above statements.

## Using your personal data and the lawful basis for that use

We are required by applicable UK data protection laws to inform you of what data, how and why we process your personal data and indicate the legal basis for such processing. The tables below details the types of personal data and the lawful basis and purpose.

Type of personal data	Collected from
<b>a) Contact Information</b>	
<ul style="list-style-type: none"><li>· Name(s)</li><li>· Address(es)</li><li>· Email address(es)</li><li>· Contact details including mobile telephone number(s)</li></ul>	You
<b>b) Personal Information</b>	
<ul style="list-style-type: none"><li>· Contact information (see above), as relevant</li><li>· Date of birth</li><li>· Gender</li><li>· Next of kin or other dependants</li><li>· Marital or relationship status</li><li>· Lifestyle and social circumstances</li><li>· Emergency contact information</li></ul>	You
<b>c) Identity and Background Information</b>	
<ul style="list-style-type: none"><li>· Contact information (see above), as relevant</li><li>· Details of education and qualifications and results</li><li>· Career history, experience and skills</li><li>· Passport information</li><li>· Driving licence information</li><li>· Psychometric test results</li><li>· Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)</li><li>· Curriculum Vitae (CV) or resume</li><li>· Image or photographs</li><li>· Application form</li><li>· Evaluative notes and decisions from job interviews</li><li>· Preferences relating to job location and salary</li><li>· Conflicts of interests (including where related to family networks)</li></ul>	You Recruitment consultants and agencies Your previous employers Publically available information from online resources
<b>d) Financial Information</b>	
<ul style="list-style-type: none"><li>· Contact information (see above), as relevant</li><li>· Bank account details</li><li>· Salary, compensation and other remuneration information</li><li>· National insurance number and/or other governmental identification numbers</li></ul>	You Your previous employers

- Tax codes

#### e) Special categories of data

- Contact information (see above), as relevant
- Racial or ethnic origin (including your nationality and visa information)
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Biometric data (including fingerprint and retinal scans)
- Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence)
- Sexual orientation
- Information relating to actual or suspected criminal convictions and offences

You

#### f) Employment Administration Information

- Contact information (see above), as relevant
- Terms and conditions of employment
- Work related contact details (including location, office and corporate phone numbers)
- Image / photographs
- Job termination details
- Your preferences in relation to our use of your personal data

You

#### g) Job Performance Information

- Contact information (see above), as relevant
- Role responsibilities
- Training records

You

#### h) Investigation, Grievance and Disciplinary

- Contact information (see above), as relevant
- Grievance and disciplinary records

You  
Third parties, as permitted  
by applicable law

#### i) Travel and Expenses Information

- Contact information (see above), as relevant
- Transaction records

You

#### j) Asset, Systems and Platform Usage and Communications Information

- Access logs and usage records from document management systems and other Severn Trent provided applications and technologies

- User IDs and password information

Your use of Severn Trent's security control systems

- IP addresses and device identifiers

- Relevant records of calls, messages and/or internet or other data traffic and communications

Lawful basis and purpose	What personal data do we use?
Processing that is necessary <b>to perform a contract</b> or when taking steps in connection with a contract with you, such as:  (a) to to set up and to administer the employment (or other) relationship that we have with you; and	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Personal Information</li> <li>• Identity and Background Information</li> <li>• Financial Information</li> <li>• Special categories of data</li> <li>• Employment Administration Information</li> <li>• Job Performance Information</li> <li>• Investigation, Grievance and Disciplinary</li> <li>• Travel and Expenses Information</li> <li>• Asset, Systems and Platform Usage and Communications Information</li> </ul>
Processing that is necessary <b>for our own legitimate interests</b> or those of third parties provided these are not overridden by your interests and fundamental rights and freedoms, such as:  (a) to manage our recruitment and hiring process, including assessing and processing your job application (we may retain a record of your information for a reasonable period of time following the end of our recruitment selection process for administration purposes);  (b) to respond to and/or deal with requests, enquiries or complaints;  (c) to manage travel expenses;  (d) for establishment and defense of our legal rights; and  (e) [to monitor IT system usage, including emails.	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Personal Information</li> <li>• Identity and Background Information</li> <li>• Financial Information</li> <li>• Special categories of data</li> <li>• Employment Administration Information</li> <li>• Job Performance Information</li> <li>• Investigation, Grievance and Disciplinary</li> <li>• Travel and Expenses Information</li> <li>• Asset, Systems and Platform Usage and Communications Information</li> </ul>
Where necessary, processing based on your freely given, specific, informed and unambiguous <b>consent</b> , such as:  (a) to record any medical conditions where necessary for matters such as making adjustments to your working environment; and  (b) to record other special categories of personal data in order to maintain a record of the diversity of our workforce.	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Personal Information</li> <li>• Special categories of data</li> <li>• Employment Administration Information</li> <li>• Job Performance Information</li> <li>• Benefits Information</li> </ul>
Processing that is necessary <b>to comply with a legal obligation</b> to which we as the data controller are subject (other than a contractual obligation), such as:	<ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Personal Information</li> <li>• Identity and Background Information</li> <li>• Financial Information</li> <li>• Special categories of data</li> </ul>



<p>(a) to process a request by you to exercise your rights under applicable data protection law or other laws;</p> <p>(b) for compliance with legal and regulatory requirements (including but not limited to health and safety laws and employment laws) and good governance obligations.</p>	<ul style="list-style-type: none"> <li>• Employment Administration Information</li> <li>• Job Performance Information</li> <li>• Investigation, Grievance and Disciplinary</li> <li>• Travel and Expenses Information</li> <li>• Asset, Systems and Platform Usage and Communications Information</li> </ul>
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