RECRUITMENT PRIVACY NOTICE

Introduction:
The Burnley Football & Athletic Company Limited ("the Company", "we", "us", "Burnley") is committed to protecting the privacy and security of your personal information. This notice explains how we collect, use and protect personal information about job applicants during the recruitment and selection process, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice applies to all candidates who apply for employment, whether directly, through an agency, or via other recruitment channels.

Data controller details:
We are the data controller for your personal data.

Contact: DPO@burnleyfc.com

You can contact the DPO about any questions, rights requests or concerns about how we process your data.

Data protection principles:
In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way,
- collect it for specified, explicit and legitimate purposes,
- only use it in the way that we have told you about,
- ensure it is correct and up to date,
- keep your data for only as long as we need it, and
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

Category and types of data we process:
During the selection and recruitment process, we may collect, store and use the following categories and types of personal data:

- ***Identification details*:** your name, address, personal email, phone number, and other contact information.
- ***Application data*:** your CV, cover letter, employment history, qualifications, skills, and experience.
- *Interview and assessment data*: notes from interviews, assessments, or tests carried out as part of the selection process.
- ***Right to work information*:** copies of your passport, visa, or other documentation proving your right to work in the UK.
- ***Equal opportunities monitoring data*:** information about your ethnic origin, religion or belief, sexual orientation, gender identity, age, relationship status, nationality, pregnancy

and maternity, caring responsibilities or disability status (*collected voluntarily and used only for monitoring equality and diversity*).
- ***References and background checks*:** information provided by referees, recruitment agencies, or background screening providers (*where applicable*).
- ***Safeguarding data*:** information provided on a self-declaration form we ask you to complete if the role involves working with children or vulnerable adults.
- ***Technical data*:** if you apply online, we may collect limited system data (*such as IP address or device information*) for security and troubleshooting purposes.

How we collect your data:
During the recruitment process, your personal data may be collected in several ways, including:
- Directly from you during the application and interview process.
- From recruitment agencies or online job boards where you have submitted your application.
- From referees or background check providers (where applicable).
- From public sources such as LinkedIn or professional networking profiles, where relevant to your application.

Purpose and lawful bases for processing:
We will use your personal data for the purposes of managing our recruitment process, assessing your suitability for employment, and communicating with you about your application.

Purpose of processing	**Lawful basis (Article 6 UK GDPR)**	**Special Category / Criminal Data Condition (Art. 9 & 10, DPA 2018)**
Assessing your skills, qualifications and suitability for a role	Art. 6(1)(b) – Contract	N/A
Communicating with you about the recruitment process	Art. 6(1)(b) – Contract	N/A
Carrying out right-to-work checks	Art. 6(1)(c) – Legal obligation	Art. 9(2)(b) – Employment, social security and social protection law (DPA 2018, Sch. 1 Part 1 para 1)
Keeping records of our recruitment process	Art. 6(1)(f) – Legitimate interests	N/A
Equal opportunities monitoring	Art. 6(1)(c) – Legal obligation	Art. 9(2)(b) – Employment, social security and social protection law (DPA 2018, Sch. 1 Part 1 para 1)
Obtaining references or background checks	Art. 6(1)(f) – Legitimate interests	Art. 9(2)(b) – Employment and social protection law (DPA 2018 Sched 1 Part 1 para 1) *(if health or other special category data is included)*
Occupational health or disability-related adjustments (*if applicable*)	Art. 6(1)(c) – Legal obligation	Art. 9(2)(h) – Occupational health (DPA 2018, Sch. 1 part 1 para 2)

Criminal record checks (*if applicable to the role*)	Art. 6(1)(c) – Legal obligation	Article 10 (DPA 2018, Sch. 1 part 2 para 6)

Sharing your data:
Your data will only be shared where necessary for selection and recruitment purposes. We may share your data with:

- Members of our HR and management teams who are involved in the process.
- Recruitment agencies, background screening providers or referees.
- IT service providers supporting our recruitment systems.
- Regulatory or law enforcement authorities where legally required.

We will not sell or share your personal information for marketing purposes.

If data is transferred outside the UK, we ensure that appropriate safeguards (such as UK adequacy regulations or standard contractual clauses) are in place.

How long do we keep your data for:
We keep personal data only as long as necessary for selection and recruitment purposes.

- **Unsuccessful candidate data:** 6 months after recruitment decision (to respond to queries or legal claims)
- **Shortlisted candidates' interview records:** 6 months after the recruitment decision
- **Successful candidates:** Data becomes part of the employee personnel file and will be retained under our Employee Privacy Notice
- **Equal opportunities monitoring data:** Anonymised after recruitment analysis is complete

Your rights in relation to your data:
The law on data protection gives you certain rights in relation to the data we hold about you. These are:

- ***The right to be informed*.** This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- ***The right of access*.** You have the right to access the data that we hold about you. To do so, you can make a subject access request.
- ***The right to rectification*.** If any data that we hold about you is incomplete or inaccurate, you can require us to correct it.
- ***The right to erasure ("right to be forgotten")*.** If you want us to stop processing your data, you can request that we delete it from our systems, especially if you believe there is no longer a valid reason for us to continue processing it and no legal requirement to retain it.
- ***The right to restrict processing*.** For example, if you believe the data we hold is incorrect, we will stop processing the data (*whilst still holding it*) until we have ensured that the data is correct.
- ***The right to data portability*.** You may transfer the data that we hold about you for your own purposes, where technically possible.
- ***The right to object*.** You have the right to object to how we use your data when it serves our legitimate interests.
- ***The right to regulate any automated decision-making and profiling of personal data*.** You have a right not to be subject to automated decision-making in a way that adversely affects your legal rights.
- ***The right to withdraw consent*.** If you have provided us with consent, you have the right to withdraw it. The process for doing so must be easily accessible. The data you provided before withdrawing your consent may still be used if we have a legitimate reason to do so.

If you wish to exercise any of the rights explained above, please contact DPO@burnleyfc.com.

Automated decision making:
We do not carry out automated decision-making or profiling that has a legal or significant effect on you.

Making a complaint:
If you have any concerns about how we handle your data, please reach out to DPO@burnleyfc.com first so we can address your issues together. If you feel that your concerns have not been adequately addressed, you may also contact the Supervisory Authority.

Information Commissioner's Office (ICO) contact details:
0303 123 1113
www.ico.org.uk