



# **Recruitment Privacy Notice**

## **Summary of how we use your data**

- The Club uses your personal data in order to communicate with you about vacancies or potential work opportunities, and make an assessment of your suitability of a role working for the Club where you have made an application.
- Where we rely on your consent, such as agreeing to receive job alerts, you can withdraw this consent at any time.
- Where you have been selected for certain roles, you will be asked to undergo an FA Disclosure and Barring Service Criminal Records Check (FA DBS CRC). We process any criminal records data from these checks to comply with employment law (where the check is required by law), to safeguard individuals at risk and to prevent and detect unlawful activity.
- You have a number of data protection rights, including the right to object to how we handle your detail. More information on this can be found in our detailed notice.

## **What does this notice cover?**

This notice describes how The Brighton & Hove Albion Football Club Limited (also referred to as "the Club", "we" or "us") will make use of your data when you apply for a vacancy, potential job opportunity or placement with us.

It also describes your data protection rights, including a right to object to some of the processing which the Club carries out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

## **Who does this notice cover?**

This notice covers anyone who expresses an interest in working on or behalf of the Club. This extends to applications received for casual and permanent positions, and any applications for work experience or work placements.

## **What information do we collect?**

We collect and process personal data about you when you interact with us by registering an interest or applying for work with us. This may include:



- Contact information: such as your name, age, date of birth, home address, and postcode, personal email address, phone numbers, LinkedIn profile and other similar information.
- Identification information: such as passport number, National Insurance Number, citizenship, visas, immigration status and copies of identity documentation, as permitted and required in order to check your right to work.
- Information concerning your education and career history a: such as your CV, job title, professional experience, education, previous employment, professional qualifications and memberships and relevant information that may be revealed by any appropriate background check.
- Other information: notice period, salary expectations and if you have worked for us before.
- Information gathered during the interview process: for example test results, interview notes and presentations.
- Unspent Criminal Convictions under the Rehabilitation of Offenders Act 1974 (if applicable): where you have applied for a relevant role, you may be asked to undergo an FA DBS CRC check. This may disclose certain convictions, including the type of conviction, dates and the details of relevant offences.
- Equal Opportunities Information: we collect data about various equal opportunities characteristics, some of which are considered to be sensitive such as, any disability or health issues, ethnicity, religion, and sexual orientation. We may take details of your disability in order to provide reasonable adjustments for you during the recruitment process. Other information is gathered only for the purposes of diversity monitoring, and is optional. We will separate this from your application once received.

## **What information do we receive from third parties?**

Sometimes, we receive information about you from third parties. In particular, we work with a number of recruitment agencies who may provide us with information that we would otherwise obtain from a candidate directly. We also receive information from the Disclosure and Barring Service via GBG Group, The Football Association and Online Disclosures where you have undergone an enhanced FA DBS CRC check.

Where you have been successful, we will seek references from companies or individuals you have nominated.



How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- As required by the Club to conduct our business and pursue our legitimate interests, in particular we will use your information to communicate with you about vacancies or potential work opportunities that you have expressed an interest in, either directly or through an agency.
- Where you give us consent.
- For purposes which are required by law.
- To assess your skills, qualifications and suitability for work opportunities you have applied for.
- To communicate with you about the recruitment process.
- To keep records relating to the recruitment and selection process.
- Ensure that we are safeguarding our fans, staff and beneficiaries when recruiting for a role which will work with or have access (either directly or indirectly) to children or vulnerable groups. Where this involves any sensitive data relating to you, such as carrying out optional FA DBS CRC checks, any sensitive data will be processed on the basis that this is intended to protect and detect unlawful activity and to safeguard individuals at risk.

We will send you messages relating to any future opportunities relevant to you. We will use information about any disabilities to consider whether we need to provide appropriate reasonable adjustments during the recruitment process – as this is sensitive data, we do this on the basis that it is required under employment law.

Under the terms of the Rehabilitation of Offenders Act 1974 we are entitled to ask for any unspent criminal convictions to assist in the assessment of your suitability for a role with the Club. We may if necessary undertake further FA DBS CRC Checks. This will be carried out where relevant for the role and the nature of its duties, and will be flagged in the recruitment advert, job description and person specification. We do this to safeguard individuals at risk, and to prevent unlawful activity.

## **Relying on our legitimate interests**



We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details set out later in this notice.

## **Withdrawing consent**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to process your personal information without your consent, where we rely on another legal basis. You can do this by contacting us using the details set out below.

## **Who will we share this data with, where and when?**

We will share your personal data with HR colleagues, and anyone involved in the recruitment and selection process e.g. hiring managers and interviewers at the Club to help them make an assessment of your potential suitability for work opportunities.

Personal data will be stored using third party service providers, who will process it on behalf of the Club for the purposes identified above. Such third parties include recruitment agents and the FA. We do not allow our third party providers to use your personal data for their own purposes, and they can only access this data with our consent.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws. Where you are an applicant for a director role, we may need to share your information with football governing bodies to satisfy any applicable Owner and Director Test Regulations.

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield



certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request.

## **What rights do I have?**

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format and to ask us to share (port) this data to another controller.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling the request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred. This is likely to be the Information Commissioner's Office in the UK.

For communicating with you about work opportunities the provision of your application and personal information is mandatory: if relevant data is not provided, then we will not be able to consider you for potential work opportunities.

Allowing us to retain your personal data for the purpose of being communicated to about future potential opportunities is optional: if relevant data is not provided, then we will not contact you about future opportunities.

## **How do I get in touch with you?**

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would



like to opt out of direct marketing, you can get in touch at [dataprotection@brightonandhovealbion.com](mailto:dataprotection@brightonandhovealbion.com) or by writing to Data Protection, Brighton & Hove Albion FC, The American Express Community Stadium, Village Way, Brighton, BN1 9BL.

## **How long will you retain my data?**

If you have been unsuccessful for a role with the Club, we will retain your personal data and application information, including information regarding the selection process and outcome if applicable for 6 months after a final decision has been made. This is so that we can show, in the event of a legal claim, that we have not discriminated against any candidates on prohibited grounds and that we have conducted the recruitment process in a fair and transparent way. You may also ask for feedback on the reasons why you were unsuccessful, and we will use the information to provide this feedback. Your application will not be used to judge any future applications you may make during this time.

If we wish to retain your personal information on the basis that a further opportunity may arise in future that you could be considered for, we will ask for your consent to retain your personal information for this reason only. If you give your consent, we will only keep your information on our live files for a maximum of 12 months, after which it will be securely destroyed.

If you are successful with your application and become a worker or employee of the Club we will retain the application and recruitment information in accordance with our HR privacy notice.

In the event of a claim being made, or considered highly likely, we may extend our retention periods in order to appropriately protect our legal position. Otherwise, after the relevant periods set out above, we will securely destroy your personal information in accordance with our data retention policy.