
FAIR PROCESSING APPLICANT DATA POLICY

Document Revision 2

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1. ABOUT THIS DOCUMENT

- 1.1. During the course of our activities, Akixi Limited will process Personal Data (which may be held on paper, electronically, or otherwise) about our applicants and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the General Data Protection Regulation. The purpose of this notice is to make you aware of how we will handle your Personal Data.
- 1.2. This notice may be amended at any time.

2. DATA PROTECTION PRINCIPLES

- 2.1. We will comply with the following data protection principles in the GDPR, which say that Personal Data must be:
- i) Processed fairly and lawfully.
 - ii) Processed for limited purposes and in an appropriate way.
 - iii) Adequate, relevant and not excessive for the purpose.
 - iv) Accurate.
 - v) Not kept longer than necessary for the purpose.
 - vi) Processed in line with individuals' rights.
 - vii) Secure.
 - viii) Not transferred to people or organisations situated in countries without adequate protection.
- 2.2. "Personal Data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, and expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

3. FAIR AND LAWFUL PROCESSING

- 3.1. We will usually only process your Personal Data where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others.
- 3.2. We will only process "Sensitive Personal Data" where you have given your explicit consent, or that the processing is a legal requirement for employment purposes.

4. HOW WE ARE LIKELY TO USE YOUR PERSONAL DATA

- 4.1. We will process data about applicants for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations as an employer, for example to assess your suitability for a role and ensure you have a legal right to work.
- 4.2. We may, where appropriate, process Sensitive Personal Data relating to applicants including:
- i) Information about an Applicant's criminal record in order to undertake a risk assessment;
 - ii) Information required to comply with legal requirements and obligations to third-parties.

5. DATA WE HOLD

- 5.1. Our Application Process requires the following data to be collected and processed. This is held for 1 year after rejection and 5 years after cessation of employment.

Details	Category Of Data	Purpose Of Processing	Article 6 Lawful Basis For Processing
Contact Details	Contact / Identity	To respond to application.	Consent
Education & Training	Education	Applicant qualification review	Consent
Employment Details	Experience	Applicant suitability for role	Consent
Criminal Record	Contact / Identity	Providing appropriate safeguards for the rights and freedoms of Data Subjects.	Regulatory, Special Category
Need For Work Permit	Contact / Identity	UK right-to-work verification.	Regulatory, Special Category

6. FAIR AND LAWFUL PROCESSING

6.1. We will usually only process your Personal Data where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others.

7. ACCURATE DATA

7.1. We will keep the Personal Data we store about you accurate and up to date. Please notify us if your personal details change or if you become aware of any inaccuracies in the Personal Data we hold about you.

8. DATA RETENTION

8.1. We will not keep your Personal Data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required.

9. DATA SUBJECT RIGHTS

9.1. You have the following rights under the GDPR:

Data Subject Rights	Description
Be Informed	Be notified about Personal Data usage (e.g. via an up-front Privacy Notice or Fair Processing Notice).
Access	Request confirmation of data usage and request access to data.
Correction	Request correction or rectification of data.
Erasure	Request data erasure (right to be forgotten).
Restrict Processing	Request restricted or suppression of Data Processing.
Transfer (Data Portability)	To reuse data in other systems or services.
Object	Object to data usage particularly when for marketing usage, Legitimate Interests given as the lawful basis of processing, scientific/historical research, or interest/exercise of official authority (including profiling).
Rights Related To Automated Decision-Making	Provisions for Individuals to be informed about Processing; allow Individuals easy access to human intervention or to challenge a decision; and to ensure organisations carry our regular checks that their systems are working as intended.

10. DATA SECURITY

10.1. We will ensure that appropriate measures are taken against unlawful or unauthorised processing of Personal Data, and against the accidental loss of, or damage to, Personal Data.

10.2. We have in place procedures and policies to maintain the security of all Personal Data from the point of collection to the point of destruction. We will only transfer Personal Data to a third-party where we have verified they are GDPR compliant and have a GDPR compliant contract with us.

10.3. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the Personal Data.

11. PROVIDING INFORMATION TO THIRD PARTIES

11.1. We will not disclose your Personal Data to a third-party without your consent unless we are satisfied that they are legally entitled to the data.

12. SUBJECT ACCESS REQUESTS

12.1. If you wish to know what Personal Data we hold about you, you must make the request in writing. All such written requests should be forwarded to The Data Protection Officer.

13. DATA PROTECTION OFFICER

13.1. The Company's Data Protection Officer (DPO) is Alison Clement (e-mail: dataprotectionofficer@akixi.com).

13.2. If you have any questions regarding GDPR, our Data protection Policies, or any of the Company's data handling and/or processing, please contact the DPO. If the DPO is not available please refer any questions to the Technical Director.

14. BREACHES OF DATA PROTECTION PRINCIPLES

14.1. If you consider that the data protection principles have not been followed in respect of Personal Data about yourself or others you should raise the matter with the Data Protection Officer. Any breach of the GDPR will be taken seriously and may result in disciplinary action.

15. CONFIRMATION & SIGNATURE

I confirm I have received a copy of this document for my records and have read and understood the contents of it.

Name:

Print Name:

Dated:
