



## The Group Practice, Stornoway

Health Centre, Springfield Road, Stornoway, Isle of Lewis HS1 2PS  
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**Consulting Doctors:** Dr Brian Michie • Dr Louise Scott • Dr Juanita Macleod • Dr Duncan Simpson

# Recruitment Privacy Notice

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The Group Practice, Stornoway [we, us] are committed to protecting and respecting your privacy. This Privacy Notice sets out the basis on which the personal data collected from you, or that you provide to us, will be processed by us in connection with our recruitment processes. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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### **For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controller is:**

The Group Practice, Health Centre, Springfield Road, Stornoway, Isle of Lewis HS1 2PS

Where you apply for a job opening posted by us, these Privacy Notice provisions will apply to our processing of your personal information.

Where you apply for a job opening via the application function on a job site or similar online service provider (“Partner”), you should note that the relevant Partner may retain your personal data and may also collect data from us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Notice.

## **Your Personal Information**

### **Information we collect from you**

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, we process personal details such as name, date of birth, email address, address, qualifications, experience, information relating to your employment history, skills and experience that you provide to us.
- If you contact us, we will keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.

## **Information We Collect From Other Sources**

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

## **Uses Made Of Your Information**

### **Lawful basis for processing**

We rely on legitimate interest as the lawful basis on which we collect and use your personal data. Our legitimate interests are the recruitment of staff for our business.

Where you apply for a job opening through an agency or third party, we rely on your consent, which is freely given by you during the application process, to disclose your personal data to an agency or third party on the basis described below.

### **Purposes of processing**

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers, e.g., recruitment agencies or job sites.
- To find appropriate candidates to fill our job openings.

### **Automated decision making/profiling**

Any decision as to who we will engage to fill a job opening will be made by our Practice Manager and GP Partners.

### **Disclosure of your Information**

As set out above, we may share your information with an agency, third party or another service provider (“Partner”), who use it only in accordance with our instructions and as otherwise required by law.

Where you have applied for a job opening through an agency, third party or another service provider (“Partner”), and where you have consented to this disclosure, we may disclose personal data that we hold, including but not limited to a unique identifier used to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that we hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively “Disposition Data”).

The Partner shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by us.

## How We Store Your Personal Data

### Security

We take appropriate measures to ensure that all personal data is kept secure including security measures 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 information 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 where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means; therefore, any transmission remains at your own risk.

### Where we store your personal data

Where we store your personal data in our own systems; it is stored in electronic format on our secure server and in paper format (until processed or no longer required) in a locked, fire-proof cabinet in the Practice Manager's office. There is restricted access to both the office and filing cabinet.

If you would like further information please contact us (see 'Contact' below).

### How long we keep your personal data

We will hold all the data for **one month** from date of receipt.

Your personal information will be deleted in one of the following circumstances:

- deletion of your personal information by you (or by another person engaged by the you); or
- receipt of a written request by you (or another person engaged by you) to us.

### Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in your information which we hold;
- require the erasure of personal data concerning you in certain situations;
- receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- object at any time to processing of personal data concerning you for direct marketing;

- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal data;
- otherwise restrict our processing of your personal data in certain circumstances;
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of these rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- contact us using our Contact details below;
- let us have enough information to identify you;
- let us have proof of your identity and address; and
- let us know the information to which your request relates.

## **How to complain**

We hope that we can resolve any query or concern you raise about our use of your information.

The **General Data Protection Regulation** also gives you the right to lodge a complaint with a supervisory authority where any alleged infringement of data protection laws occurs. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or by telephone: 0303 123 1113.

## **Contact**

All questions, comments and requests regarding this Privacy Notice should be addressed to:

**Jennifer Hepburn, Data Protection Officer**

**The Group Practice, Health Centre, Springfield Road, Stornoway, Isle of Lewis HS1 2PS**

**Phone: 01851 703145, Ext 239**

**Email: [jennifer.hepburn2@nhs.net](mailto:jennifer.hepburn2@nhs.net)**