

Recruitment Data Privacy & Use of Publicly Available Information

Introduction

Your personal data is important to us. This policy explains how Scientifica collects, uses, stores, and protects personal data during the recruitment and selection process.

We use trusted third-party providers to support recruitment activities, including criminal record checks and limited review of publicly available information.

We process personal data in line with the UK GDPR, the Data Protection Act 2018, the Equality Act 2010, and guidance issued by the Information Commissioner's Office (ICO).

Data we collect and process during the formal recruitment process

The formal recruitment process begins when you apply for a role with us, whether by:

- Submitting a CV and cover letter
- Applying via a job board (such as LinkedIn or Indeed)
- Applying through a recruitment agency

During the recruitment process, we may collect and process:

- Recruitment information such as application forms, CVs, references, qualifications, professional memberships, and pre-employment assessments
- Details of your driving record, where relevant
- Identification documents, including passport or driving licence, and right-to-work information
- Any information you choose to include in your application

Lawful basis for processing

We process personal data for recruitment purposes on the basis of:

- Legitimate interests, to assess suitability for employment and maintain a safe working environment
- Compliance with legal obligations, such as right-to-work checks

Any use of publicly available information must be relevant, necessary, and proportionate to the role being recruited.

Where third-party providers are used, they act on our instructions and process personal data only for recruitment purposes.

Use of third-party recruitment providers

We may use third-party recruitment providers to support recruitment activities. This may include:

- Managing applications or candidate searches
- Conducting screening or pre-employment checks
- Supporting shortlisting or suitability assessments

Where a third-party provider is used:

- They act as a **data processor** on our behalf
- They are required to process personal data securely and confidentially
- They may only use personal data in line with our instructions and applicable data protection laws

We do not permit third-party providers to use candidate data for their own independent purposes.

Use of publicly available information

Where a conditional offer of employment is made, we will carry out screening of publicly available online information using a third-party provider.

This may include:

- Public social media content
- Online posts or content accessible without login
- Other publicly available online material

This screening is limited to identifying serious, clearly defined risks, such as:

- Behaviour that may pose a risk to colleagues, customers, or the public
- Content indicating potential safeguarding concerns
- Evidence of serious unlawful or inappropriate conduct
- Significant reputational risk relevant to employment

We do not use publicly available information to:

- Build a general profile of a candidate
- Assess personal lifestyle, beliefs, or opinions unrelated to the role

How screening results are used

Where screening is carried out:

- It is conducted using structured and consistent criteria
- Only information assessed as relevant is reported to Scientifica
- Reports are used as a prompt for further review, not a decision

If potentially adverse information is identified:

- Candidates may be given the opportunity to provide context or clarification
- Information is assessed alongside other recruitment evidence
- Decisions are based on relevance, context, and overall suitability for the role at Scientifica

Recruitment decisions are not made solely on the basis of screening results.

Transparency and candidate awareness

This screening is undertaken in line with our legitimate interests in ensuring safe, appropriate, and informed hiring decisions, including protecting our people, customers, and reputation and must remain fair, necessary, and proportionate.

As outlined in this policy, we carry out limited screening of publicly available information following a conditional offer of employment.

Where screening is conducted, you will be informed about the nature and scope of the checks by our third-party provider at the point the screening is initiated.

Further information about how your personal data is processed as part of these checks will be provided by the third-party provider.

If you choose not to proceed with the required screening, we may be unable to finalise your offer of employment.

Limitations of screening

We will not:

- Access private or restricted accounts
- Request passwords or login details
- Attempt to bypass privacy settings
- Conduct intrusive or excessive monitoring

Screening is limited to publicly available information only.

Information we will not use

Information must not be used to:

- Assess personal lifestyle choices unrelated to the role
- Make subjective judgements about personality or beliefs
- Influence decisions based on protected characteristics

Recruitment decisions must not and will not take into account information relating to:

- Age
- Disability or health
- Race, ethnicity, or nationality
- Religion or belief
- Sex, gender identity, or sexual orientation
- Pregnancy, family or caring responsibilities
- Trade union membership
- Political opinions

If such information is encountered incidentally, it must not and will not influence decision-making.

Criminal background checks

Where a conditional offer of employment is made, you will be asked to complete a basic DBS (Disclosure and Barring Service) check.

Criminal record checks are carried out with the support of a third-party provider acting on our behalf.

If an unspent conviction is deemed unsuitable for the role, we may withdraw the offer of employment. Further information is available in our Criminal Record and Background Checks Policy.

Special category data

Information about how special category personal data is collected and processed is set out in our Privacy Notice for Team Members, which is available on request prior to joining Scientifica.

Recruitment mailing list

When you sign up to our recruitment mailing list, we may collect:

- Your name

- Email address
- Country location

We may also record the department you are interested in, the date you signed up, and whether you were recommended and by whom.

Your data will not be shared unless you formally apply for a role.

How we process, protect and store your data

Your personal data is stored securely within our cloud-based systems. We use appropriate technical and organisational measures to protect personal data, including:

- Firewalls and secure connections
- Restricted access permissions
- Multi-factor authentication and strong password controls
- And regular monitoring to prevent unauthorised access, loss, or misuse.
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Access is limited to:

- The People Services Team
- Relevant members of Senior Leadership
- Hiring managers / supporting colleagues involved in recruitment

If your details are shared with another hiring manager where you could be suitable for a different role, you will be informed.

Where third-party recruitment or screening providers are used, relevant personal data may be shared securely with them for recruitment purposes only.

Decision-making and records

Where personal data, including publicly available information, materially informs a recruitment decision:

- Its relevance to the role must be clear and justifiable
- Decisions must be evidence-based and defensible
- Notes must focus on job-related criteria only

Recruitment decisions are not made solely on the basis of publicly available information or third-party screening results.

How long we keep your data

Unsuccessful candidates	Data, including interview notes, will be retained for six months and then deleted.
Successful candidates	Data will be retained in line with the Privacy Notice for Team Members.
Recruitment mailing list	Data is held until you unsubscribe.

Your rights

You have the right to:

- Access your personal data
- Request correction or deletion where appropriate
- Restrict or object to certain processing

Requests can be made to:

dataprivacy@scientifica.uk.com or **peopleservices@scientifica.uk.com**

Roles, responsibilities, and compliance

Hiring managers and interviewers must follow this policy and avoid informal, excessive, or undocumented online screening. HR provides guidance and oversight.

Breaches of this policy may result in disciplinary action.

Review

This policy will be reviewed regularly and updated to reflect changes in data protection law, ICO guidance, or recruitment practices.