



## **Job Applicant Privacy Notice (compliant with GDPR)**

Freejam Ltd – Data Controller  
Applicants – Data Subject  
Third Party – Data Processor

As part of any recruitment process, Freejam Ltd collects and processes personal data relating to job applicants. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

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

Freejam collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration; including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK.

Freejam may collect this information in a variety of ways. For example, data might be contained in application forms, CV's or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of consent.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and with your consent.

Data will be stored in a range of places, including on your application record, in HR managements systems, Applicant Tracking Systems (ATS) and on other systems including email.

### **Why does Freejam process personal data?**

We need to process data to take steps at your request prior to entering into a contract with you.

In some cases, we may need to process data to ensure that we are complying with its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts.

Freejam has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond and defend against legal claims.

Freejam may process special categories of data, such as information about ethnic origin to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out its obligations and exercise specific rights in relation to employment.

All applicants have the option to consent to Freejam keeping the data and have the option to withdraw consent at any time.

### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We may share your personal data with third parties (Data Processors) who are GDPR compliant for the purposes of recruitment, for example the applicant tracking system. If your application is successful and we make an offer of employment we will then share your data with former employers to obtain references with your consent.

### **How does Freejam protect data?**

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **For how long does Freejam keep data?**

If your application for employment is unsuccessful, the organisation will hold your data on file for 12 (twelve) months after the end of the relevant recruitment process. If you agree to allow us to keep your data on file we will hold your data for further 12 months for consideration of future employment opportunities. You can withdraw consent at any time. You will be asked when you submit your CV whether you give us consent to hold your details for the full 12 months in order to be considered for other positions or not.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a privacy notice.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes or processing; and
- object to the processing of your data where Freejam is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights please contact [careers@freejamgames.com](mailto:careers@freejamgames.com)

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You are under no statutory obligation to provide data to Freejam during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.