

**INTO** »



**PRIVACY NOTICE FOR CANDIDATES AND PROSPECTIVE  
EMPLOYEES OF THE INTO COMPANIES AND ASSOCIATED  
JOINT VENTURES**

May 2018

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## About this Privacy Notice

This privacy notice is issued by the following companies which are referred to in this document as “The Companies”.

In the United Kingdom:

- INTO City LLP
- INTO Gloucestershire LLP
- INTO London World Education Centre Ltd
- INTO Manchester Ltd
- INTO MDX Street LLP
- INTO Newcastle University LLP
- INTO Queens LLP
- INTO Scotland LLP
- INTO UEA LLP
- INTO University of Exeter LLP
- INTO University of Stirling LLP
- INTO University Partnerships Ltd
- IUP2 LLP
- Newcastle University INTO London LLP
- Delta Language and Training Consultancy Ltd (trading as NILE)

In the United States of America

- INTO CSU, LLC
- INTO Marshall, LLC
- INTO Mason, LLC
- INTO North America, Inc.
- INTO NY at Drew, LLC
- INTO OSU, Inc.
- INTO SLU, LLC
- INTO Suffolk, LLC
- INTO UAB, LLC
- INTO USF, Inc.
- INTO WSU
- INTO Illinois State University, LLC
- ISES

Outside the UK and US

- INTO China Ltd (WFOE)
- DPU China
- IUP (Asia) Ltd (Topco)
- IUP Asia Ltd

Each of The Companies is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are sharing this privacy notice (typically via an email, through an employment agency or a link on a job advertisement) because you are applying for work with us (whether as an employee or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment process, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

## Data Protection Principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about;
- Kept securely.

## The kind of information we hold about you

Regarding your application to work with us, we will collect, store, and use the following categories of personal information about you:

- Information you have provided to us in your curriculum vitae/resume and covering email / letter / statement;
- Information you have provided on an application form, including name, title, address, telephone number, personal email address, employment history including reasons for leaving and explanation for any gaps in your employment history and qualifications.
- Any information which you provided to an employment agency (or similar individual / organisation) and that they have passed on to us;
- Any information you provide to us or questions you ask us during an interview, whether conducted in person, by telephone or other media;
- Any information you provide to us directly or is provided to us by your recruitment agency during written or verbal correspondence;
- References from individuals or companies that we contact as part of the recruitment process;
- For relevant posts, results of enquiries to the UK Disclosure and Barring service or local equivalent in other countries.

We may also collect, store and use sensitive personal information from the following sources:

- Any sensitive personal information you provide to us or questions you ask us during an interview, whether conducted in person, by telephone or other media;
- Any sensitive personal information that is provided to us by a recruitment agency during written or verbal correspondence;
- Any sensitive personal information that is provided to us by referees during written or verbal correspondence.

## How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate;
- Any recruitment agency appointed by you or us;
- Any appointed background check provider or similar government agency (US only);
- For certain roles and locations, any credit or other referencing agency;
- Criminal records checking service (DBS in the UK) in respect of criminal convictions;
- Reference providers;
- Publicly available information including LinkedIn and other social media.

## How we will use information about you

We will use the personal information we collect about you to:

- Objectively assess your skills, qualifications, and suitability for the role applied for;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our recruitment processes;
- Comply with legal or regulatory requirements;
- Perform statistical analysis (although this data will be anonymised).

It is in our legitimate interests to decide whether to appoint you to the role applied for since it would be beneficial to our business to appoint someone to that role and we need to process your personal information to decide whether to make an offer of employment to you.

We will use information about you during the recruitment process including making decisions regarding suitability for shortlist, interviewing, reference checking, offer and appointment.

Should you tell us or we become aware of any information which it is not legal to use during the recruitment and selection process (such as your age or a disability), we will of course not use it to make decisions about your application.

## If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application. For example, if we require a credit check or references for a particular role and you fail to provide us with relevant details, we will not be able to take your application further.

## How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- To make adjustments requested by the candidate during the recruitment process, for example whether adjustments need to be made during a test or interview; e.g. a candidate with accessibility needs;
- We will use information about your race or national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting;
- To meet our obligations under the Fair Employment and Treatment regulations for candidates based in Northern Ireland;
- We will use information regarding criminal convictions to assess your suitability for particular roles.

## Information about criminal convictions

To the extent allowed by law, we envisage that we will process information about criminal convictions for certain roles.

We will collect information about your criminal convictions history if we would like to offer you a role where employment is conditional on checks and any other conditions, such as references, being satisfactory. For certain roles we are required and/or entitled to carry out a criminal records check to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable. In particular:

- We are legally required by law to carry out criminal record checks for those carrying out teaching and other roles where there may be unaccompanied contact with minors;
- Some roles, for example, senior roles in Finance, Human Resources and Legal require a high degree of trust and integrity and so we may ask you to seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## Automated decision-making

You will not be subject to decisions that will have a significant impact on your application based solely on automated decision-making.

## Data Sharing

### Why we might share your personal information with third parties?

We may share your personal information with the following types of third parties for the purposes of processing your application: credit checking, other referencing agencies and recruitment agencies. All our third-party service providers and other entities in the INTO Group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

There are some roles where the recruitment process includes employees of our partner universities and INTO Companies other than the one you have applied to. In these cases we will share your personal and relevant sensitive personal information with those specific employees solely for the purposes of the recruitment process.

## Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our Data Protection Officer.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Data Retention

### How long will you use my information for?

We will keep your personal information for a period of twelve months after we have communicated to you our decision about whether to appoint you to the role applied for. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy or applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## Rights of Access, Correction, Erasure and Restriction

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access to your personal information** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes;
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Request the transfer of your personal information to another party.**

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer in writing or by email to [Privacy@intoglobal.com](mailto:Privacy@intoglobal.com)

## Right to Withdraw Consent

When you applied for a role with one of The Companies, you provided consent for us to process your personal information for the purposes of the recruitment process. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our Data Protection Officer, details below. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our data retention policy, we will dispose of your personal data securely.

## Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

### Contacting our DPO

Email: [Privacy@intoglobal.com](mailto:Privacy@intoglobal.com)

Address: F.A.O. The Data Protection Officer, INTO University Partnerships Limited, One Gloucester Place, Brighton, East Sussex, BN1 4AA, England.

Each of The Companies is subject to the authority of the Information Commissioner's Office (the "ICO") in the UK who are the supervisory authority for data protection issues. You can also contact them for advice and support, however, we would really appreciate the opportunity to assist you at the outset if you have any queries regarding this notice or how we use your data.

Thank you for taking the time to read our privacy notice.