

Recruitment Privacy Notice

Introduction

We are committed to protecting your privacy and confidentiality. This notice explains what personal data (information) Congenica (“we”, “us”) will hold about you, how we collect it, and how we will use and share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice and any other similar notice we provide to you from time to time when we collect or process personal information about you. These Privacy Notices reflect legal requirements, regulations, and best practice.

For the purposes of data protection legislation, Congenica are Data Controllers registered with the Information Commissioner (ZA066945).

By applying to work for Us, processing your personal data becomes necessary ‘in order to take steps, prior to entering into a contract’. This forms the lawful basis for the processing of your information, covered under Article 6(1)(b) – Contract – of the GDPR. Any special category data processed for this process is lawful under Article 9(2)(b) – Employment. We also have a legitimate interest in processing your personal data to make sound, fair and justifiable recruitment decisions to benefit Congenica, (covered under Article 6 (i)(f) – legitimate interests).

IRIS HR is our online platform for storage of our employee personal data. Information is stored in two purpose built and secure data centres in the UK, IRIS HR own their own servers which gives them added control and security [ISO 27001/ISO 9001](#)

We use IRIS HR to assist with our recruitment process and to process personal information as a data processor on our behalf. IRIS HR is only entitled to process your personal data in accordance with our instructions. Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to our processing of your personal information.

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 other third parties such as references and background checks where applicable.
- To find appropriate candidates to fill our job openings.
- To help our service providers (such as IRIS HR and its processors and data providers) and Partners (such as the job sites or agencies through which you may have applied) improve their services.

We understand that the privacy and confidentiality of all the personal information you provide and that we handle, is important to you, and our internal policies and procedures reflect this and the need to share the minimum information necessary. We reserve the right to change these Privacy Notices from time to time and when we do so we will revise the effective date at the bottom of the statement.

Information we collect before making a final decision to recruit

We collect the following personal information about you in the following ways:

Information we collect 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, email address, address, date of birth, qualifications, experience, employment history, interests and other information you choose to state in your application.
- Details of your referees.
- Your nationality and immigration status and information from related documents, such as your passport
- Any medical conditions or disabilities of which we need to be aware, where any adaptations are necessary for example.
- If you contact Us, we may keep a record of that correspondence.

Information we collect from other sources

We will add to the information we collect from you with information we receive from other sources, we may receive:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers.
- Confirmations regarding your academic and professional qualifications.



- Information regarding your criminal record, in criminal records certificates and enhanced criminal records certificates (from the Disclosure and Barring Service).
- Your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

How we use collected information

We use the personal information we collect to ensure that we provide you with the best possible support now and in the future. We use the personal information that we collect from/ about you to:

- Take steps to enter into a contract;
- Comply with a legal obligation (e.g. our obligation to check that you are eligible to work in the United Kingdom);
- Ensure we make a sound and appropriate recruitment decision; and
- Communicate with you.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Disclosure of your information

Congenica works hard to ensure that only the right people have access to your personal data, and information is only shared (both within and external to Congenica) on a strictly 'need to know' basis. Anyone receiving information about you will be under an equal legal duty to keep it confidential.

We may also need to share some of the above categories of personal information with other parties, such as HR consultants, professional advisers, your referees and certain other third parties where this is required to process your application, for example to carry out background checks. Usually, information will be anonymised, but this will not always be possible. The recipient of the information will be bound by confidentiality obligations.

Where hiring managers are outside of the UK, they will have access to employee data.

We do not sell, use or share your personal information for direct marketing or other external promotional purposes. We will always seek your permission ahead of disclosing any information that identifies you directly to any other person or organisation, or, for any other reason not set out in this policy unless we have an overriding legal duty to do so.



How we secure your information

We place great importance on the security of your personal data and other information about you. We have put controls in place to safeguard your personal information, applying physical, technical and procedural measures against unauthorised access, loss, misuse and alteration of personal information under our control.

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.

We have achieved the International Standard certification for information security (ISO 27001) and maintain the Cyber Essentials certification.

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.

How long do we keep your information?

If your application to become a Congenica employee is unsuccessful or you withdraw from the process, we retain your details for 6 months from the date of this decision. If you are successful in the recruitment process, you will be issued with an Employment Contract, and once signed become an employee. At this time we need to process additional personal data for other purposes, you will be supplied with a Data Storage & Access document setting out our retention periods. You will also be issued with an Employee Privacy Notice setting out how we process your information during your employment with Congenica.

Our data retention practices are reviewed annually in conjunction with industry standards and best practice.

What happens if you don't provide any relevant data?

If you fail to provide any personal data when requested, we may not be able to evaluate your application and therefore process your application further.



Automated decision-making

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

Your data protection rights

You have various rights under applicable data protection laws, including the right to:

- access your personal data (also known as a “subject access request”);
- correct incomplete or inaccurate data we hold about you;
- ask us to erase the personal data it holds about you;
- ask us to restrict its handling of your personal information;
- ask us to transfer your personal information to a third party;
- object to how we are using your personal information and
- withdraw your consent to us handling your personal data.

For more detailed information on your rights visit <https://ico.org.uk/for-the-public/>.

If you would like to exercise any of these 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.

Your questions and how to contact us

If you have any questions or comments about these notices, please let us know:

Web: <https://www.congenica.com>

By email: HR@congenica.com

By telephone: on 01223 499965

Or by post to: Biodata Innovation Centre, Wellcome Genome Campus, Hinxton, Cambridge, CB10 1DR

