

PPL Group – Recruitment Privacy Notice

Purpose of this privacy notice

This is the recruitment privacy policy of Parking Partners (Management Services) Limited and Parking Partners Limited, collectively referred to as PPL Group for the purposes of this policy.

PPL Group respects your privacy and is committed to protecting your personal data.

Parking Partners (Management Services) Limited is a "controller" in relation to personal information. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal information will be used, namely for the purposes of the recruitment process, and how long it will usually be kept for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

We have a separate privacy notice applicable to any use of our websites (www.parking-partners.co.uk and www.chelseabridgecarpark.com) including any data you may provide through the websites when you use contact forms, download any materials available on the websites or sign up for any services. Please find a copy of this [here](#).

Who we collect your personal information from

We collect personal information about candidates from the following sources:

- You, the candidate.
- The PPL Group staff member recommending you, the candidate. From which we collect the following categories of information: CV and covering letter.
- Unity recruitment agency and job websites e.g. Totaljobs, from which we collect the following categories of information: CV and covering letter.
- Disclosure and Barring Service in respect of criminal records.
- Your named referees, from whom we collect the following categories of information: length of service, reason for leaving and performance information.

The types of information we hold about you

In connection with your application for work with us, we may collect, store and use some or all the following categories of personal information about you:

- **Identity information:** first name, last name, any previous names, marital status, title, date of birth, gender and photo.
- **Contact information:** addresses, telephone numbers, personal email addresses and emergency contact information to arrange or coordinate meetings, interviews, tests or assessments using communications channels including email, telephone, text or candidate dashboards or platforms.
- **Recruitment information:** copies of right to work documentation, copies of passport or other photo ID, drivers licence, references, and information included in a CV (for example, prior employment, education or qualifications), or cover letter or as part of the application process or examples of work (for example, written materials, photos, video or audio recordings)
- **Employment status check information:** results of HMRC employment status check, background or vetting checks and details of your interest in and connection with the intermediary through which your services are supplied.

- **Third party information:** shared by parties including those mentioned in the section above and any relevant education or training establishments, previous employers, recruitment agencies, head-hunters and third-party platforms, including: background and vetting, recruitment, testing or assessment.
- **Selection and assessment information:** information recorded as part of the recruitment process, including candidate selection, interview and assessment information including notes, recordings and transcriptions and any relevant internet searches (where permitted).

We may also collect, store and use the following types of more sensitive (known as 'special category') personal information:

- **Health and medical:** information about and connected with your health, any medical condition or disability.

Criminal offences: We may also collect, store and use criminal offence information about you. This is information about criminal convictions and offences, including information about the alleged commission of offences, proceedings for an offence committed (or alleged to have been committed) and the disposal of those proceedings, including sentencing.

How we will use information about you

We will only use your personal information when we have a lawful basis to do so. Our lawful basis for each purpose for which we use your information is set out below. Most commonly, we will use your information to:

- Assess your skills, qualifications, and suitability for a role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role.

We may sometimes use your personal information because we have a recognised legitimate interest. Where we rely on a recognised legitimate interest, we will ensure the use is strictly necessary and only use or share the minimum information required in connection.

We also need to process your personal information to decide whether to enter into a contract of employment (or otherwise, as applicable) with you.

Process

Having received your CV and covering letter and/or any other form of application, together with the results from any recruitment assessments you have participated in, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references, and/or carry out a criminal record and any other required check before confirming your appointment.

Using personal information for new purposes

We will not use your personal information in ways that are unexpected, unfair, or that could have an unjustified negative impact on you.

Before we use your personal information for any new purpose, we will ensure the processing is fair and lawful. In particular, we will confirm that an appropriate lawful basis applies to the new purpose and (where relevant) that any additional requirements for special category information or criminal offence information are met.

We will carefully consider whether any new use is compatible with the original purpose for which your information was collected. In making that assessment, we take into account several factors, including:

- How closely connected the new purpose is to the original one.
- The context in which your information was collected, including your reasonable expectations at the time.
- The nature and sensitivity of the information involved.
- The potential impact on you.
- The safeguards we have in place to protect your information.

Where we do intend to use your information for a new purpose, we will inform you and provide any relevant information before doing so. In some cases, you will have the right to object to that use, and we will make you aware of this right whenever it applies.

If you fail to provide personal information

In some cases, providing your personal information to us is a statutory or contractual requirement. For example, if we require references for a role and you do not provide us with relevant details, we will not be able to take your application further.

Where we ask you for personal information for these purposes, we will make clear why we need it. If you do not provide it, we may be unable to carry out our legal or contractual obligations which may affect you. For example, if you do not 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 successfully.

Where providing your information is voluntary, we will tell you this and explain any consequences of not doing so.

1.1 Initial application information

Purpose/Use	Type of information	Lawful basis
HR records: setting up your candidate record in the HR Department	Identity information Contact information Recruitment information	Contract performance Our legitimate interests which are to retain a candidate record.
Grievance issues OR Complaints	Identity information Contact information Recruitment information	Contract performance Legal obligation Our legitimate interests which are to show compliance.

Legal disputes	Identity information Contact information Recruitment information	Legal obligation
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1.2 Candidate assessment information

Purpose/Use	Type of information	Lawful basis
Screening and profiling candidates and candidate data analytics to assess suitability for employment or future employment	Identity information Contact information Recruitment information Third party information Selection and assessment information	Contract performance Our legitimate interests which are to ensure candidate suitability.
Qualifications and skills: assessing qualifications and skills for a particular job or task	Identity information Contact information Recruitment information Third party information Selection and assessment information	Contract performance Our legitimate interests which are to ensure candidate suitability.
Right to work: confirming entitlement to work in the UK	Identity information Contact information Recruitment information Employment status check information	Contract performance Legal obligation Our legitimate interests which are to ensure candidate suitability.
Grievance issues OR Complaints	Identity information Contact information Recruitment information Third party information Selection and assessment information Employment status check information	Contract performance Legal obligation Our legitimate interests which are to ensure show compliance.
Legal disputes	Identity information Contact information Recruitment information Third party information Selection and assessment information Employment status check information	Legal obligation

How we use your special category personal information

Where appropriate we will use your special category personal information in the following ways:

- We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made, for example during a test or interview or in any other relevant circumstance.

1.3 Health and medical information

Purpose/Use	Lawful basis	Additional ground
Assessment of fitness to work	Contract performance Legal obligation Our legitimate interests which are to ensure candidate suitability.	Employment law Assessment of working capacity
In relation to reasonable adjustments	Contract performance Legal obligation Our legitimate interests which are to ensure role suitability.	Employment law Assessment of working capacity
Grievance issues OR Complaints	Contract performance Our legitimate interests which are to show compliance	Employment law Assessment of working capacity
Legal disputes	Legal obligation Our legitimate interests which are to show compliance	Legal claims

1.4 Financial or regulatory information

Purpose/Use	Lawful basis	Additional ground
Professional regulatory checks (for specific roles such as financial or accounting)	Contract performance Our legitimate interests which are to show compliance	Assessment of working capacity
Grievance issues OR Complaints	Contract performance Our legitimate interests which are to show compliance	Employment law
Legal disputes	Legal obligation Our legitimate interests which are to show compliance	Legal claims

1.5 How we use Information about criminal offences

We may need to process information about criminal convictions.

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

- Roles in Head Office require a high degree of trust and integrity (since it involves dealing with high value client money) and so we would like to 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 information.

Purpose/Use	Lawful basis	Additional ground
Necessary for the reasons set out above	Contract performance Our legitimate interests which are to ensure candidate suitability.	Employment
Grievance issues OR Complaints	Contract performance Our legitimate interests which are to show compliance.	Employment
Legal disputes	Contract performance Legal obligation Our legitimate interests which are to show compliance.	Legal rights

Automated decision-making

Automated decision-making is the process of making decisions by automated means with or without any human involvement.

We do not make decisions about you based solely on automated processing that would have legal, or similarly significant, effects for you. We will notify you if this position changes.

Use of AI tools

We do not currently use AI tools or AI services to support recruitment processes. Where AI tools or services are provided by suppliers, those suppliers are required to process your personal information only in accordance with our instructions and are not permitted to use it for their own purposes, including to train AI models, without our authorisation.

Data sharing

Why we might share your personal information with third parties

We will only share your personal information with the following third parties to process your application: Disclosure and Barring Service in respect of criminal records. All our third-party service providers and other entities in the 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 information for their own purposes. We only allow them to process your personal information for specified purposes and in accordance with our instructions.

Cross-border data transfers

We will not transfer your personal information outside the UK.

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 lead whose contact details are set out in the section below headed 'Questions or complaints'.

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 retain your personal information for 12 months after we have communicated to you our decision about whether to appoint you to a role. 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 process in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we would like to retain your personal information on file, on the basis that we might be able to consider you for an opportunity that may arise in future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period for that purpose.

Your rights in relation to your information

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

- **Request access** to your personal information (commonly known as making 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. We will conduct a reasonable and proportionate search for your personal information.
- **Request rectification** 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 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 information, or request that we transfer a copy of your personal information

to another party, please contact our data protection lead using the contact details set out in the section below headed 'Questions or complaints'.

Questions or complaints

If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact our data protection lead using the following details:

- Data protection lead: Harry Naughton
- Email address: enquiry@parking-partners.co.uk
- Postal address: Audley House, Palace St, Victoria, London SW1E 5HX
- Telephone number: 0203 627 1994

You have the right to complain to us if you consider that there has been an infringement of your rights in relation to your personal information. A copy of our complaints policy is available [here](#).

You can submit a complaint using the following channels:

- Online complaint form [here](#).
- Email address: enquiry@parking-partners.co.uk
- Postal address: Audley House, Palace St, Victoria, London SW1E 5HX
- Telephone number: 0203 627 1994

When we receive a data protection complaint, we will:

- Acknowledge receipt no later than 30 days from receiving it.
- Take appropriate steps to respond without undue delay, which may include making enquiries into the subject matter of the complaint and, where appropriate, keeping you informed about the progress of our handling of the complaint.
- Inform you of the outcome without undue delay.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), who is responsible for data protection issues in the UK.

I, _____ (candidate name), acknowledge that on _____ (date), I received a copy of this Candidate Privacy Notice and have read and understood it.

Signature

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Name

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