

Job Applicants Privacy Notice

Data controller: Picker Institute Europe, Suite 6, Fountain House, 1200 Parkway Court, John Smith Drive, Oxford, OX4 2JY

Data protection officer: Mike Donoghue – DPO@pickereurope.ac.uk

As part of any recruitment process, Picker Institute Europe (“Picker”) collects and processes personal data relating to job applicants. Picker is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does Picker collect?

Picker 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 Picker needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK.

Picker may collect this information in a variety of ways. For example, data might be contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Picker may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. Picker will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Information may also be collected by us from publicly available information including from the internet and business social media sites such as LinkedIn.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does Picker process personal data?

Picker needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

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

Picker 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 Picker to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to

whom to offer a job. Picker may also need to process data from job applicants to respond to and defend against legal claims.

Picker may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants require reasonable adjustments to be able to participate in the recruitment process. Picker processes such information to carry out its obligations and exercise specific rights in relation to employment.

Picker requires information about criminal convictions and offences as part of its recruitment process. Where Picker seeks this information, it does so because it is necessary to carry out its obligations and exercise specific rights in relation to employment. Any criminal record checks are completed only after a conditional offer of employment has been made.

If your application is unsuccessful, Picker may keep your personal data on file in case there are future employment opportunities for which you may be suited. Picker will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

In compliance with Article 6 of the UK GDPR, the following table outlines Picker's legal basis mapping in respect of processing your personal data:

Purpose	Typical lawful basis
Receiving and assessing an application, communicating about it, interviewing and deciding whether to offer	Article 6(1)(b) — steps at the applicant's request before entering a contract
Right-to-work checks	Article 6(1)(c) — legal obligation (Immigration, Asylum and Nationality Act 2006)
Reasonable adjustments during recruitment	Article 6(1)(c) and Article 9(2)(b), plus DPA 2018 Schedule 1 Part 1 paragraph 1
Managing the process, assessing suitability, keeping recruitment records, defending claims	Article 6(1)(f) — legitimate interests
Keeping an unsuccessful application for future vacancies	Article 6(1)(a) — consent
Criminal record checks after a conditional offer, where the role requires them	Article 6(1)(c) or 6(1)(f), Article 10, and a Schedule 1 condition
Reviewing or improving the recruitment process (including limited use of AI tools)	Article 6(1)(f)

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 team with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Picker will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Picker will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Picker does not presently transfer your data outside the UK or European Economic Area, but should it ever be required to, Picker will ensure that appropriate safeguards such as model clauses are in place before doing so.

How does Picker protect data?

Picker takes the security of your data seriously. It has 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 Picker keep data?

If your application for employment is unsuccessful, Picker will hold your data on file for up to six months after the end of the relevant recruitment process. If you agree to allow Picker to keep your personal data on file, Picker will hold your data on file for an additional six months for consideration for future employment opportunities. At the end of that period (or once you withdraw your consent), your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

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

- restrict Picker from actively processing your data;
- request your data from Picker in a portable form;
- withdraw consent to Picker processing your data;
- access and obtain a copy of your data on request;
- require Picker to change incorrect or incomplete data;
- require Picker to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where Picker is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Mike Donoghue, Data Protection Officer, at DPO@pickereurope.ac.uk

If you believe that Picker has not complied with your data protection rights, you can make a complaint to Picker's CEO or the Data Protection Officer. You can also make a complaint to the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or by telephone on 0303 123 1113.

All complaints received by Picker will be reviewed without undue delay and be responded to within 30 days.

Picker is registered with the ICO under the registration number Z4942556.

<https://ico.org.uk/ESDWebPages/Entry/Z4942556>

What if you do not provide personal data?

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

Automated decision-making

Automated individual decision-making is a decision made by automated means without meaningful human involvement, that may possibly result in a different outcome for you. Picker may use AI-assisted tools to help parse and analyse application materials and to identify relevant skills, experience and qualifications. These tools are used to support the recruitment process and do not make recruitment decisions. All recruitment decisions are made by people.

A member of Picker staff reviews the relevant application materials and makes each shortlisting and appointment decision.

We do not use special category data (such as health, ethnicity, religion or sexual orientation if known) as input to these tools, and we do not allow AI system vendors to train their models on applicant data submitted to Picker.

Changes to this privacy notice

We may change this privacy notice from time to time. The version found on the Picker website should be regarded as the most current.

Policy Validity

Policy issue date:	8 th September 2026
Policy review date:	8 th September 2027
Policy responsibility:	Data Protection Officer