

Privacy Notice – Recruitment

Introduction Highland and Islands Airports Limited (HIAL) is a public corporation wholly owned by the Scottish Ministers. The company operates and manages 11 Airports at Barra, Benbecula, Campbeltown, Dundee, Islay, Inverness, Kirkwall, Stornoway, Sumburgh, Tiree and Wick. HIAL's airports are vital to the social and economic welfare of the areas they serve, but are loss making, and are supported by subsidies from the Scottish Government in accordance with Section 34 of the Civil Aviation Act 1982.

HIAL uses personal information for a range of purposes and our privacy notices provide information about why we obtain and collect personal information, and how we process it.

This document provides information about how your data is collected, how it is used and the basis for processing your data during the recruitment process. Personal information is provided through our recruitment website, which is provided by MHR on HIAL's behalf.

Why are we collecting your information?

The primary purpose of the recruitment website is to allow people to receive information about posts that are available within the HIA group of companies (which includes AMSL and DAL as well as HIAL), and to enable people to create and submit a job application where they wish to be considered for one of the positions available.

What information is collected?

The information we collect from you will depend upon how you wish to use the website. To sign up to job alerts, you create a profile for which we require:

- Your e-mail
- Your alert preferences

To apply for a position with the HIA group of companies, we will collect the following information from you, via the recruitment webpage:

- Name
- Address
- Contact details (Email and phone)
- Employment history
- Training and qualifications
- Work achievements
- Referees
- Information to allow us to monitor our compliance with equalities legislation
- Information to allow consideration under the Disability Confident Scheme and if any adjustments are required for the recruitment process
- Driving license status for some roles

In addition to the information collected from you online. The following information will be collected offline:

- Medical questionnaire
- Most posts will also require us to obtain a security pass for you and you are likely to require a Disclosure Scotland certificate
- Candidates successful for Security roles will also be required to complete a Counter Terrorist Check
- Where there is a qualification that is essential to the role, successful candidates will be required to provide evidence of this

It should be noted that the information requirements may vary accordingly to role and if you have any queries about information we are asking you for, please contact recruitment@hial.co.uk in the first instance.

HR and vacancy managers may review candidate profiles on professional social networking sites, such as LinkedIn, as part of the recruitment process where it is appropriate to do so for the role being applied for. If you have any queries regarding whether your internet profile will be viewed as part of the application process, please contact recruitment@hial.co.uk

How will my information be used?

Lawful Basis

Depending on the processing activity, our use of your personal data falls within different lawful grounds under the UK GDPR,

- For a specific purpose where you have given consent -UK GDPR Article 6(1)(a)
- For the performance of our employment contract with you -UK GDPR Article 6(1)(b)
- For compliance with a legal obligation, we are subject to -UK GDPR Article 6(1)(c)
- For the purposes of a legitimate interest - UK GDPR Article 6(1)(f)

Where you have requested that job alerts are e-mailed to you, we are processing this request based on your consent. You will be e-mailed an alert each time a relevant new vacancy is added to the website. You may withdraw this consent at any time.

Information relating to a specific job application is processed for the purposes of taking the necessary steps to enter into a contract of employment. For successful candidates, HIAL will retain this information on your personnel file to manage this contract. All data for employees will be processed in line with Company Policies. Policies are available to all staff via the Intranet, or by request to all.

For unsuccessful candidates, a limited amount of information about your application is retained for a short time after the decision-making process is complete to ensure we are able to deal with any queries relating to your application. This is in the legitimate interests of HIAL to ensure it is able to provide feedback to candidates and manage any enquiries or correspondence arising from the recruitment process. Further information on retention timescales is provided below in the section *What happens when my information is no longer required?*

Where the information we process is special category personal data, for example: Equalities information or data relating to health and disabilities, or criminal conviction data used for checking purposes, additional lawful grounds apply where processing is necessary:

- For carrying out our obligations and exercising our rights in employment and your rights in employment and social security (UK GDPR Article 9(2)(b)) and DPA 2018, schedule 1, part 1, para 1
- For reasons of substantial public interest (UK GDRPR Article 9(2)(g)) and DPA 2018, schedule 1, part 2, para 8: equalities monitoring and reporting.

International Transfer

HIAL has data processing agreements in place with those that process personal information on our behalf, including our IT system provider that helps us manage recruitment. Your personal information will not be transferred to any countries that are outside of the UK.

Will my information be passed to anyone else?

Where you have signed up for job alerts, your data will be processed by IT companies processing personal information on HIAL's behalf, and will not be passed to any other third parties.

Any information submitted in response to a job application will be passed to the recruitment panel members, with the exception of any information relating to equalities.

Equalities information is processed by the HR team only. Equalities information is information provided regarding protected characteristics as defined by the Equality Act and for the purpose of equalities monitoring. This includes racial or ethnic origin, religious beliefs, disability status, and gender identification, marital status, and sexual orientation, and may be extended to include other protected characteristics

Information may be sent to other third parties where it is required as part of the recruitment process.

- This may include passing information to HIAL's Occupational Health provider or GP surgery providing this service on HIAL's behalf
- Tax information will be provided to HMRC for successful candidates for the purpose of collecting tax and national insurance contributions.
- Home Office for specific security pass holders

Personal data is not processed by third parties other than those listed above and the recruitment website which provides the storage facility for applications.

What happens when my information is no longer required?

If you no longer require job alerts, you may withdraw your consent at any time by contacting recruitment@hial.co.uk and you will be removed from HIAL's job alerts with immediate effect. You can also unsubscribe from these alerts using the link in the e-mail confirming subscription or by logging into the recruitment website.

Personal information submitted as part of a job application will be retained as follows:

- For successful candidates who enter into a contract of employment, information is retained for 6 years from the date of termination of employment. HIAL has a legitimate interest in retaining personal data after a contract has concluded.
- For successful candidates who chose not to enter into a contract of employment and unsuccessful candidates, information held through the recruitment website is retained for twelve months from the end of the recruitment exercise and information held outwith the recruitment website is retained for six months from the end of the recruitment exercise.
- Personal information that has been uploaded to the website and has not been used as part of a job application will be deleted by HIAL's HR team once the closing the date for the post has passed. It will be archived and deleted automatically after 12 months.

Additional rights

Under the GDPR, you have a number of rights in relation to your personal information. You have the right to:

- request access to your personal information
- request rectification of your personal information which means you are able to have inaccurate personal information corrected without undue delay
- request erasure of your personal information when certain conditions apply
- restrict processing under certain circumstances
- object to processing
- data portability in some circumstances.

Requests that relate to rectification, erasure or restricting processing will be passed to any recipients of your personal information. Details of recipients can be found under the section above entitled *Will my information be passed to anyone else?*

There may be occasions when HIAL is unable to comply with requests to exercise the rights above. Should this apply to a request you make, it will be explained to you why HIAL is unable to comply with the request and any options available.

Where your personal information is being processed using consent, one further right is the right to withdraw your consent at any time. You should be aware that, while HIAL will stop using your information for that purpose with immediate effect. You can find out how your personal information is being lawfully processed under the section above entitled *How will my information be used?* You may withdraw your consent at any time for allowing your information to be used for marketing purposes, which includes your information being processed for the purposes of receiving job alerts.

Complaints

Should you be unhappy with the way in which HIAL have processed your personal data, you have the right to lodge a complaint with the Information Commissioner, who regulates data protection legislation across the UK. Their contact details can be found at <https://ico.org.uk/>

Contact details

HIAL's Data Protection Officer can be contacted at dpo@hial.co.uk

For matters relating to the recruitment process, please contact recruitment@hial.co.uk