



Privacy Statement

This Privacy Statement explains how we protect visitors' information gathered during the recruitment process. If you have any questions regarding this Privacy Statement, please do not hesitate to contact us on recruitment@kclub.ie

We at The K Club respect your right to privacy and comply with our obligations under Data Protection Acts 1988-2018 and the General Data Protection Regulation (GDPR).

Candidates

In order to recruit new members of our team, we need to collect personal data relating to candidates that apply for various positions. For the purposes of this Privacy Statement a Candidate includes:

- An individual who submits their information to The K Club for the purpose of obtaining employment/work experience.
- An individual who is approached by The K Club to submit information for the purpose of recruitment, and later does so.

Sources of Data

We receive personal data about Candidates from a variety of sources, including:

- Direct Contact:
 - the Candidate may send their CV or other relevant information to The K Club directly, with the intention of applying for a position or obtaining employment.
- Websites:
 - the Candidate may apply directly to a position advertised on The K Club website
 - the Candidate may apply to a position advertised on a third-party jobs' website
 - the Candidate may be sourced from publicly accessible platforms where The K Club employees are also registered users, for example LinkedIn;
 - the Candidate may be sourced from third party CV providers such as jobs websites who provide CV search facilities and where users have made their CV data available to registered customers of these sites;
- Other Third-Party Sources:
 - we may receive personal data about a Candidate from nominated referees of the Candidate or from other Associated Contacts of the Candidate
 - the Candidate may be referred to us from another Candidate or Employee
 - the Candidate may be referred to us from a third-party recruitment agency

The Information We Process



Personal Data means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, email address, phone number, etc.

Categories of Personal Data	Examples of Personal Data
Personal Details	<ul style="list-style-type: none"> • Name • Surname • Title • Date of Birth
Associated Contact information	<ul style="list-style-type: none"> • Phone Number • Email Address • Social Media Links • Home Address
Candidate CV Information	<ul style="list-style-type: none"> • Employment History • Skills/ Experience • Languages • Educational History • Qualifications • Membership Of Professional Associations • Contact Details of Employer References/Character References • Licenses Held • Interests And Hobbies
Candidate application data	<ul style="list-style-type: none"> • Salary, • Notice Period, • Details of Visa or Eligibility to Work, • Details of Fitness to Work, • Background History • Photographic Images, • Video Applications If Available, • Desired Salary, • Cv Received Date, • 'Referred By'.
Candidate compensation data including	<ul style="list-style-type: none"> • Salary • Benefits
Candidate payroll data including	<ul style="list-style-type: none"> • Bank details • Tax information and documentation • Social security information • PPS Number • Payment information
Pre – Employment Checks	<ul style="list-style-type: none"> • Psychometric tests • Qualification's check • Fitness to work confirmation & other Health issues requiring adaptations to working environment
Referees Information	<ul style="list-style-type: none"> • Name, job title & company • Phone Number • Email Address • Reference Details



Lawful Processing of This Information

Under the GDPR, there are specific grounds under which processing of personal data can be undertaken. The K Club fully respect your right to privacy and will only collect or process your personal data the following purposes:

The consent of the individual

The K Club may ask you for your consent to process particular data including:

- Using cookies in accordance with our Cookie Policy.
- Using special categories of data, or sensitive data.

In asking for you for your consent, we will provide you with more information on how we will use your data, including in relation to your consent to sharing information with third parties.

Performance of a contract

As part of the recruitment process and for the employment and payment of employees, your personal data is collected to:

- Evaluate recruitment candidates
- Assess candidate qualifications and skills
- Carry out steps in the recruitment process including to set up and evaluate interviews and assessments.
- Contact References
- Keep records related to the recruitment process

Compliance with a legal obligation

The K Club is required to gather certain data in order to comply with various legal obligations, including:

- Information Rights
- Legislative Requirements and Responsibilities

Necessary to protect the vital interests of a person

The K Club may be required to gather certain data in order to protect the vital interests of an individual

Necessary for the performance of a task carried out in the public interest

The K Club may be required to gather certain data in order to perform a task that is carried out in the public interest

In the legitimate interests of company/organisation

The K Club may be required to gather certain data in the legitimate interests of the company (except where those interests are overridden by the interests or rights and freedoms of the data subject).



Examples of the reasons the company may collect your personal data in reliance on the company's legitimate interests include:

- In protecting our business, reputation, resources and equipment.
- In managing The K Club's systems and information.
- In being subject to an audit, or for statistical or reporting purposes.
- In providing security and preventing and detecting crime including using CCTV at our premises.
- In managing and administering our legal and compliance affairs.

Further Processing of Your Information

The K Club will process your personal data for the purposes for which they were originally collected. It will only be processed further for the following purposes:

- Archiving your personal data
- Internal auditing or investigations
- Dispute resolution
- Using legal or business consulting services
- Insurance issues
- Conducting an analysis or research

Sharing of Your Data

We do not share any of your Personal Data except in the below limited cases of:

- Companies or individuals who provide support with recruitment, candidate interview and assessment services
- Third party HR providers
- Previous employers and referees that were provided by you
- Third party I.T. providers
- Third party legal services providers

The K Club will need to share your personal information internally as part of the recruitment process. The information we share internally is limited and only is only shared with those that are involved in the recruitment process, including:

- Employee who would potentially have managerial responsibility for you or an employee acting on this individual's behalf.
- Members of the HR team
- The interview panels
- The I.T. team who manage user access to our systems
- The maintenance team or those employees who manage access to the company buildings and facilities

Data Retention

The GDPR requirements ensure that personal data is not retained for longer than is necessary. We must be able to justify why we are retaining data and we must ensure that data retention is minimised.

In relation to employment documents, certain employment legislation prescribes a statutory minimum period to retain records which are outlined in the below table:



This table will be used as a guide but data can be retained longer than is outlined in the table if it can be justified.

Data	Time Period
<ul style="list-style-type: none">• CVs• Interview Notes• Interview Assessment Forms• Offer Letters• Regrets• References	12 months from when the position was filled.
<ul style="list-style-type: none">• Passports• Birth Certs• Drivers Licenses	Will be verified at recruitment stage to ensure the employee is permitted to work in Ireland but will not be stored on the system. A copy of the driver's licence (if any) should be forwarded to the insurance company/car company.



Recruitment Data Privacy Statement

Status	Date	Implemented/Reviewed By
Implemented	September 2021	M. Morgan
Next Review	September 2022	