



## **EFL Candidate Privacy Notice**

### **What is the purpose of this document?**

The Football League Limited (**EFL**) is a "data controller", responsible for deciding how we hold and use personal information about you. This notice sets out how and why your personal data will be used as part of our recruitment exercise, and how long it will usually be retained for.

### **What kind of information do we hold about you?**

In connection with your application, we will collect, store, and use the following types of personal information about you:

- information you have provided to us in your curriculum vitae and/or covering letter (where applicable).
- information you have provided on our application form (where applicable), including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications.
- information you provide to us during an interview.
- Information we may request from you during the process, including that required to fulfil our obligations in ensuring you are eligible to work in the United Kingdom, carrying out Disclosure and Barring Service (DBS) checks where relevant, and obtaining details of your nominated referees. You must ensure you have permission of your referee to provide us with their identity and contact details.

We may also collect, store and use "special categories" of more sensitive personal information such as information about your race or ethnicity, health (including any medical condition, health and sickness records) religious beliefs, sexual orientation, political opinions and/or information about criminal convictions and offences (where applicable).

### **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Any recruitment agency which you have engaged, from which we may receive the information you have sent to them.
- Our background check provider, from which we collect information relating to you for senior appointments (where applicable).
- Disclosure and Barring Service in respect of criminal convictions and/or your eligibility to work with vulnerable people (where applicable).
- Your named referees, from whom we collect information such as your previous dates of employment, absences, and any other information your referee may choose to disclose.
- Data a publicly accessible source, including public social media accounts.

### **How we will use information about you**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the 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 role since it would be beneficial to our business to appoint someone to that role and to obtain the best possible candidate for the role.

If you fail to provide all information necessary for us to consider your application will not be able to process or take your application further. Incomplete applications will, as we determine, be returned or securely disposed of.

### **How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- to consider whether we need to provide appropriate adjustments during the recruitment process if you have provided information about your disability status, for example whether adjustments need to be made during a test or interview.
- Where applicable, in connection with our duties to ensure you are eligible to work in the United Kingdom.
- to ensure meaningful equal opportunity monitoring and reporting, where you have provided us with information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation.

### **Information about criminal convictions**

We envisage that we will process information about criminal convictions, where the nature of the role requires this.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. If you would like further information in this regard please contact our Human Resources Department.

### **Will my personal information be shared with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application: other companies in the EFL group (including, where necessary, EFL Digital or EFL Trust), and any recruitment or search agency with which you have engaged in relation to the recruitment process.

We may also need to share your personal information with certain third-party service providers (for example, providing meeting room booking or interview venue hosting services. They 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 data for their own purposes, unless they have other lawful grounds to do so.

### **How is my data kept secure?**

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. We also limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. Details of these measures may be obtained from our Human Resources Department.

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.

### **How long will you use my information for?**

If you are unsuccessful in your application, we will usually only retain your personal information for a period of six (6) months after we have notified you of our decision declining your appointment to the role. This is simply to show we have conducted the recruitment exercise in a proper manner. Your information will then be securely destroyed.

Occasionally we may wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that. Whether we do this is at our absolute discretion, subject to your consent to retain your personal information for a fixed period on that basis. We DO NOT accept speculative applications and any such applications will be, as we determine, returned or securely destroyed.

### **What are my rights in relation to my data?**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the recruitment process.

Under certain circumstances, you may have the right to the following in relation to your personal information we hold:

- **Request access:** (commonly known as 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.
- **Request correction:** This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request deletion:** 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:** this applies where we are relying on a legitimate interest (or those of a third party) and you want to object to processing on this ground. This also applies where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing:** You can ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or reason for processing.
- **Request the transfer:** You can ask us to transfer your personal information to another party.
- **Right to withdraw consent:** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

Please note some of the above rights apply only in certain circumstances and/or be subject to conditions. For further information or to exercise any of these rights, please contact our Data Protection Officer in writing.

You will not usually have to exercise these rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive (or we may refuse to comply with the request in such circumstances).

For security reasons we may need to request information from you to help us verify your entitlement to exercise any of your rights and/or to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Do you have a Data Protection Officer (DPO)?**

We have appointed a DPO to oversee compliance with this notice. If you have any questions about this notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.