

## **MPIIL Recruitment Privacy Notice**

### **Who we are**

Pan Macmillan, Priddy Books and Macmillan Distribution (MDL) are all trading divisions of Macmillan Publishers International Limited, which is part of the Holtzbrinck Publishing Group.

When you apply to work at Pan Macmillan, Priddy Books, Macmillan Distribution (MDL) or in our central services team, Macmillan Publishers International Limited (“we”, “us” or “our”) will be the “data controller” of your personal information. This means that we are responsible for deciding how we hold and use your personal information. Our company number is 02063302 and our registered office is at: Cromwell Place, Hampshire International Business Park, Lime Tree Way, Basingstoke, Hampshire, RG24 8YJ, although you may be applying for a role which is based in one of our other locations.

You are being provided with this Privacy Notice because you are applying to work with us (whether as an employee, worker or contractor) and it provides you with certain information that must be provided under the General Data Protection Regulation about how we collect and use your personal information as part of the recruitment process. Please read this notice carefully to understand our use of your personal information.

### **Scope**

This Privacy Notice applies to all candidates (including those that may be unsuccessful in the application process) and third parties whose information you provide to us in connection with any application.

Where we refer to “candidate personal information”, “employee” or “employment” in this Privacy Notice, we do so for convenience only and this should in no way be interpreted as purporting to confer employment status. This Privacy Notice does not form part of any contract of employment and does not confer any contractual right on you, or place any contractual obligation on us.

By “personal information” we mean information which identifies you or which could identify you. This Privacy Notice applies to all personal information collected, maintained, transmitted, stored, retained, or otherwise used (i.e. processed) by us in connection with your application to work for us, regardless of the media on which that personal information is stored.

### **Personal information we collect**

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

- Any information you provide to us in your CV and covering letter, for example, your name, address, email address and phone number as well as information relating to your education, qualifications, professional experience and employment history, language skills, hobbies and pastimes.
- Any information you provide to us during an interview, including notes taken in your interview.
- Results of any tests or exercises which we require you to complete as part of the recruitment process (where applicable).
- Details of your existing salary and employment benefits and/or your expected salary for the role.
- Correspondence relating to your application.

### **If you are successful in your application**

If, after the recruitment process, you are successful in your application, we will make you an offer of employment which will be conditional upon you providing us with additional information, including:

- Confirmation and evidence of your eligibility to work in the United Kingdom.
- Contact details of your referees.
- A declaration as to whether you have any medical condition or disability that may affect your ability to undertake the role.
- A declaration as to whether you have any unspent criminal convictions.
- Additional personal and contact details relevant to your future employment with us.

### **How we collect your personal information**

We collect personal information about candidates through the application and recruitment process, either directly from candidates or sometimes from employment agencies. We will also collect reference information from your named referees.

### **How we use your personal information**

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

- Assess your skills, qualifications, and suitability for the role you have applied for.
- Carry out reference checks.
- Communicate with you about the recruitment process.
- Keep records relating to our recruitment processes.

- Comply with legal or regulatory requirements.
- Enforce our legal rights and process any claims we receive in connection with the recruitment process.
- In the case of health and disability information disclosed to us, we use this to determine whether we need to provide you with reasonable adjustments during the recruitment process and during any future employment.
- In the case of successful candidates, we will also process personal information collected during the recruitment process for the purpose of your future employment with us.

Our recruitment activities involve human-decision making and you will not be subject to decisions which are based solely on automated decision making as part of the recruitment process.

### **The legal reasons for using your personal information**

When we collect and use your personal information we only do so in accordance of the legal reasons available to us under data protection law. In the context of recruitment, we process personal information as it is in our legitimate interests to appoint suitable candidates and because we need to process your personal information to decide whether to enter into a contract of employment (or other type of contract with you).

Where we collect “special categories” of more sensitive personal information from candidates, including health and disability information and information about criminal convictions we do so only where necessary for the purpose of carrying out our obligations and exercising our rights under employment law or for the assessment of your working capacity.

### **What if you do not provide personal information that we request**

If you fail to provide information when requested which is necessary for us to consider your application, we will not be able to take your application further.

### **Sharing your personal information**

In order to make hiring decisions, your personal information will be disclosed to our HR team, to relevant managers and to other personnel within the team to which you are applying who are involved in the interview and decision making process.

It may be necessary from time to time for us to disclose your personal information to third parties, including:

- Third parties who provide data processing and IT services to us including, data back-up, security and storage providers and cloud-based software providers.

- Other companies which are related to us through common ownership who provide IT and system administration services and undertake group level reporting.
- Other third party service providers which assist in the administration, processing and management of certain activities relating to our recruitment such as travel and expense management service providers and providers of occupational health services.
- Third parties with whom we may choose to sell, transfer or merge parts of our business or our assets.
- Professional advisors such as external lawyers, external auditors, insurance or tax consultants and claims handlers.
- Any other third parties (including regulatory authorities, the police, courts and government agencies) where necessary to enable us to enforce or protect our legal rights, or where such disclosure may be permitted or required by law.

### **Where we store your personal information**

The personal information that we collect about you may be transferred to, and stored at, a destination outside the European Economic Area (the European Economic Area being the European Union and Iceland, Liechtenstein and Norway, which is also referred to as the “**EEA**”) for the purposes described above.

Countries outside of the EEA may not have data protection laws that provide the same level of protection as those within the EEA and so whenever we transfer your personal information outside the EEA, we take steps to ensure all personal information is protected with adequate safeguards. You can obtain information concerning such safeguards by contacting us using the details provided below.

### **How we keep your personal information safe**

We take looking after your information very seriously. We have implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, to protect it from improper access, use, disclosure, alteration, destruction and loss.

We have also put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## How long we hold your personal information

We retain personal information of unsuccessful candidates for a period of six months after we have communicated our decision about who we are appointing to the 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 exercise in a fair and transparent way.

Depending on the nature of the role they have applied for, in some cases we will keep personal information of unsuccessful candidates for an additional six month period, so that we can consider them for other opportunities which may arise in future. We will communicate this to you if this is the case.

## Candidate responsibilities

It is important that the personal information which we hold about you is accurate and current. Please keep us informed of any changes to your personal information.

## Your legal rights

You have various rights in law in respect of the personal information we hold about you which are set out in more detail below:

- **Access:** You have the right to request confirmation that we are holding your personal information and to access a copy of the personal information that we hold about you. This is commonly known as a "data subject access request" and enables you to check that we are handling your personal information lawfully.
- **Correction:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erase:** You can ask us to delete or remove your personal information where it is no longer necessary for us to use it, or where we have no lawful reason for keeping it.
- **Objection:** You can object to our processing of your personal information where we are relying on a legitimate interest if there is something about your particular situation which makes you believe it impacts on your fundamental rights and freedoms.
- **Transfer:** You can ask us to provide the personal information which you have given to us in a structured, commonly used, electronic form, so it can be easily transferred.

- **Restriction:** You can ask us to suspend the processing of your personal information, for example if you want to establish its accuracy or where you have objected to our use of it.

If you wish to exercise any of your rights, you can do so using the contact details provided below.

Please note that these rights may not be exercised in certain circumstances, such as when the processing of a candidate's data is necessary to comply with a legal obligation or for the exercise or defence of legal claims. If this is the case you will be notified of this at the time of your request.

If you make a request we may require specific information from you to help us confirm your identity. This is to ensure that personal information is not disclosed to anyone who does not have the right to receive it.

## **Complaints**

We hope that you won't ever need to, but if you would like to complain about our use of your personal information, please contact us using the contact details set out below. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the ICO [website](#).

## **How to contact us**

For further information about our privacy practices, to request to exercise any of your privacy rights described in this notice or to make a complaint please contact us via email: [mpilrecruitment@macmillan.com](mailto:mpilrecruitment@macmillan.com) or by using the postal address of our HR Department:

Macmillan Publishers International Limited  
Cromwell Place,  
Hampshire International Business Park,  
Lime Tree Way,  
Basingstoke,  
Hampshire,  
RG24 8YJ  
FAO: The HR Department

## **Updates to this Privacy Notice**

We may make changes to this Privacy Notice from time to time. We will post any changes to on our website.

This Privacy Notice was last updated on 22 May 2018.

(Version 1.0)