



## **Recruitment Privacy Notice**

Cara Credit Union Ltd. (Cara CU) is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal data about you during and after the recruitment and selection process for a position with us.

This privacy notice is for distribution amongst all potential job applicants to Cara CU including employees, contractors, agency workers, consultants, directors etc. of the credit union. There may be elements of the notice that are not applicable to you according to the specific role you undertake within the credit union.

### **We may collect the following information:**

- The information you have provided to us in your application;
- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Tax Identification number;
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Any information you provide to us by email, telephone or during an interview;
- Any information gathered as part of an aptitude/other test which forms part of the application process;
- Details of your referees.

### **We may also collect, store and use the following "special categories" of more sensitive personal information where they relate directly to your application for a specific position:**

- Information about your race or ethnicity
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences (applies to certain roles only).

### **We may also collect the following information after the shortlisting stage, and before making a final decision to recruit:**

- Information about your previous academic and/or employment history, including details of any conduct or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications;
- Where applicable, information regarding any criminal record, in criminal records checks and credit history and any other data revealed during background screenings;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information. Candidates are required (by law or in order to enter into your contract of employment) to provide this information to us to enable us to verify your right to work and suitability for the position.
- A copy of your driving licence (If relevant to the position you are applying for);


## How we collect the information


We collect personal data about candidates from the following sources:


- Data you ( the candidate) submits in resumes/CVs , letters, or other written material;
- Data we collect and share with independent Recruitment Agencies/Consultants, who act on our behalf as a recruitment agency or as a third party placement firm;
- Job search websites from which we collect personal data;
- If the position you are applying for is a Controlled Function (CF), then we may conduct an ICB or CCR credit reference check, along with Visionnet check to comply with the Central Bank's Fitness & Probity;
- Your named referees, from whom we collect data about your previous employments e.g. work hours, how you carried out your duties etc.

## Why we collect information and how we use it

We will typically collect and use this information for the following purposes:

	<b>Fulfilling a contract:</b> we need to process your personal information to decide whether to enter into a contract of employment with you assess your skills, qualifications, and suitability for the position.
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	<b>Our legal duty:</b> This basis is appropriate when we are processing personal data to comply with EU or Irish Law <ul style="list-style-type: none"><li>• For compliance with a legal obligation (e.g. our obligation to check that you are eligible to work in the Republic of Ireland);</li><li>• To ensure that we keep records relating to our hiring processes and procedures;</li><li>• To undertake any relevant checks where the role might be classed as a Controlled Function/Pre-Approval Controlled Function.</li></ul>
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	<b>Legitimate interests:</b> A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.
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Having received your CV/covering letter/application form and the results from any test which you may have taken, we will then process that information to decide whether you meet the necessary requirements to be shortlisted for the role. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the position. If we decide to offer you the position we will then take up references AND/OR carry out a check on your suitability AND/OR carry out ANY OTHER check, before confirming your appointment.

In general, to minimise the number of people in the credit union who access your personal data, we will restrict it to those who will evaluate your application for employment, provide functions supporting our recruiting and selection team e.g. external interviewers, or to those to whom we are compelled to provide it by any applicable law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

## If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application

successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### Change of purpose

You can be assured that we will only use your data for the purpose it was provided and in ways compatible with that stated purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### How we use special category data

We will use your special category data in the following ways:

- We will use information about your race or national or ethnic origin to establish if we require a work permit for you to be eligible to work for us;
- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation.

### Information about criminal convictions

We will process information about criminal convictions in respect of the following roles only:

- We are required by the Central Bank of Ireland to carry out criminal record checks for those carrying out Controlled Functions and Pre-Approval Controlled Functions.






We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your history which makes you unsuitable for the role(s).



Where we do process criminal data we will ensure that appropriate additional safeguards, as required by the Data Protection Act 2018, are in place.

### Data Retention Periods

We will only retain your personal information for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal/contractual obligation to keep it. We document the reason(s) for our retention periods and where possible the retention periods themselves in our Retention Policy.

### Your Rights in connection with your personal data

	<b>Access Request:</b> To find out whether we hold any of your personal data, you can request that a copy of that data be furnished to you. You are also entitled to request further information about the processing.
	<b>Request Correction:</b> You can request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.
	<b>Request Erasure</b> of your personal information. 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).
	You can <b>object to processing</b> of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
	You can request the <b>restriction of processing</b> of your personal information. You can ask us to suspend processing personal information about you, in certain circumstances.

	Where we are processing your data based solely on your <b>consent</b> you have a right to withdraw that consent at any time and free of charge.
	<b>Portability of Data:</b> Request that we: a) provide you with a copy of any “relevant personal data” in a reusable format; or b) request that we transfer your relevant personal data to another controller where it’s technically feasible to do so. “Relevant personal data” is personal data that: You have provided to us or which is generated by your use of our services, which is processed by automated means and where the basis that we process it is on your consent or on a contract that you have entered into with us.

**\*\*Please note that the above rights are not always absolute and there may be some limitations\*\*.**

We may need to verify your identity if we have reasonable doubts as to who you are, at the time of exercising any of the above rights. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

To help us to ensure that our information is up to date and accurate, please help us by telling us immediately if there are any changes to your personal information.

### Contact Details

For queries in relation to any aspect of data protection, please contact the following person at Cara Credit Union:

<b>The Data Protection Officer (DPO)</b> Cara Credit Union Ltd. 45-47 Ashe Street, Tralee, V92 XY06, Co. Kerry	<b>Tel:</b> 066 712 2373 <b>E-Mail:</b> <a href="mailto:data.protection@caracreditunion.ie">data.protection@caracreditunion.ie</a>
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You also have the right to complain to the Supervisory Authority, which in Ireland is the Data Protection Commission (DPC), in respect of any processing of your data:

<b>Data Protection Commission</b> Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois	<b>Tel:</b> 057 868 4800 or 0761 104 800 <b>Lo Call Number:</b> 1890 252 231 <b>E-mail:</b> <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>
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