



GDPR Fair Processing Notice for Candidates

1. Purpose

This notice outlines what personal information iCare Housing will collect from job applicants, why it is required, how the information will be used and how it will be protected under Data Protection legislation, which includes the EU General Data Protection Regulation (GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

Data Protection legislation imposes strict requirements to protect an individual's right to privacy in relation to their personal information.

iCare Housing CLG is the Data Controller and is responsible for determining how and why your personal data is processed.

2. Who This Notice Applies To

This notice applies to:

- Job applicants.

It applies to personal data processed by iCare Housing in connection with recruitment and selection.

3. What Types of Personal Data Do We Process?

This notice relates to personal information processed by iCare Housing for the purpose of assessing your job application. This may include your name and contact details; information contained in your application form, CV or cover letter, such as your employment history, education, qualifications, training and skills; details about the type of role you are seeking and other relevant job preferences; referee details and information provided by referees or previous employers; and information collected

during interviews, assessments or other stages of the recruitment process. We may also process information relating to your eligibility or right to work, together with any other information that is reasonably necessary for recruitment purposes. Where relevant and necessary, we may process special category personal data, such as health or disability information. This information will only be processed where there is an appropriate lawful basis and a valid condition under Article 9 GDPR, including where necessary to meet employment law obligations or exercise employment-related rights. Such information will be treated confidentially and access will be limited to staff or other authorised persons who need it for their role. If you provide referee details, you should ensure that those individuals are aware that their information has been provided to iCare Housing for the purpose of obtaining a reference.

4. Where Do We Obtain Your Personal Data?

Most personal information processed during recruitment is provided directly by you through your application form, CV, cover letter, correspondence, interview or other communication with iCare Housing. Where appropriate, we may also receive information about you from referees you have nominated, previous employers, recruitment agencies or service providers, occupational health providers, organisations involved in verifying qualifications or other relevant information, and other lawful sources connected with the recruitment process. Where personal information is obtained from someone other than you, we will only use it where there is an appropriate lawful basis for doing so.

5. For What Purpose Will Job Application Data Be Used?

Personal information provided by you, or lawfully obtained from other sources, may be used to verify information supplied during the recruitment process, assess your suitability for the role, review your qualifications, skills and experience, carry out reference checks, communicate with you, arrange interviews or assessments, provide reasonable accommodations where necessary, and complete any lawful pre-employment checks. We may also use your information to comply with employment, equality, health and safety and other legal obligations, and to maintain appropriate

recruitment records. Where necessary, we may process health or disability information to meet legal obligations, support reasonable accommodations and help provide a safe and suitable working environment. If you are employed by iCare Housing, relevant information collected during the recruitment process may become part of your employment record and may then be used for employment and Human Resources purposes.

6. Legal Basis for Processing

iCare Housing will only process personal information where there is an appropriate lawful basis under the GDPR and the Data Protection Act 2018. The lawful basis relied upon will depend on the purpose of the processing.

iCare Housing may rely on the following lawful bases:

- **Consent – Article 6(1)(a)** -Where you have freely given your specific and informed consent to the processing of your personal data for a particular purpose. You may withdraw your consent at any time.
- **Contract and Pre-contractual Steps – Article 6(1)(b)** -Where processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.
- **Legal Obligation – Article 6(1)(c)** -Where processing is necessary for iCare Housing to comply with a legal obligation.
- **Vital Interests – Article 6(1)(d)** -Where processing is necessary to protect the vital interests of you or another person, for example in an emergency involving a risk to life.
- **Legitimate Interests – Article 6(1)(f)** -Where processing is necessary for the legitimate interests of iCare Housing or a third party, provided those interests are not overridden by your rights and freedoms. Legitimate interests may include matters such as health and safety, protecting property responding to complaints or disputes, and establishing, exercising or defending legal claims.

- **Special Category Personal Data** -Where special category personal data is processed, iCare Housing will also rely on an appropriate condition under Article 9 GDPR.

7. Is Providing Personal Data Mandatory?

Some personal information is necessary for iCare Housing to consider and process your application and to take steps before potentially entering into an employment contract with you. Certain information may also be required by law. If you do not provide information that is necessary, we may be unable to properly assess or progress your application, verify information relevant to the role, complete required pre-employment checks or enter into an employment relationship with you. Where appropriate, we will explain when particular information is mandatory and what the consequences may be if it is not provided.

8. Who May Access Your Data?

Access to your personal information is limited to people who have a legitimate need to use it as part of the recruitment process. This may include Human Resources, hiring managers, interviewers or interview panel members, and other authorised staff involved in recruitment. Where necessary, external interviewers may also have access to relevant information to support the interview process. We may also share personal information with third-party service providers that support recruitment, Human Resources, occupational health, data storage, IT or security. Where a third party processes personal information on our behalf, we will require appropriate safeguards to protect your data and ensure it is only used for the purposes for which it was provided. Personal information may also be disclosed where this is required or permitted by law.

9. Automated Decision-Making

iCare Housing does not engage in automated decision-making or profiling involving your personal data .

10. How Long Will Your Job Application Data Be Kept?

We will only keep personal information collected during the recruitment process for as long as it is necessary for the purposes for which it was collected, taking account of any legal, regulatory, contractual or operational requirements. Recruitment records may include application forms, CVs, correspondence, interview notes and other documents created or received during the recruitment process. When this information is no longer required, it will be securely deleted or destroyed in accordance with iCare Housing's Data Retention Schedule and Policy. If you are successful in your application, relevant recruitment information may be retained as part of your employee personnel file where it remains necessary for employment purposes.

11. Change of Purpose

iCare Housing will use your personal data for the purposes for which it was collected.

If it becomes necessary to use your personal data for another purpose that is compatible with the original purpose, we may do so where permitted by law.

If we need to use your personal data for an unrelated purpose, we will inform you of the new purpose and explain the lawful basis that allows us to process the information.

12. Your Rights

Under Data Protection legislation, you have a number of rights in relation to the processing of your personal data.

These may include:

- Right to be informed about how your personal data is collected and processed;
- Right of access to your personal data and supplementary information and the right to obtain confirmation that your personal data is being processed;
- Right to rectification where your personal data is inaccurate or incomplete;
- Right to erasure in certain circumstances where there is no lawful reason for the organisation to continue processing your information;
- Right to restrict processing in certain circumstances;

- Right to data portability, where applicable;
- Right to object to certain processing of your personal data;
- Rights relating to automated decision-making and profiling, where applicable; and
- Right to withdraw consent where processing is based on consent.

These rights are subject to the circumstances of the processing and any conditions or exemptions provided by Data Protection legislation.

13. How to Make a Subject Access Request or Exercise Your Rights

You may exercise your data protection rights, including your right to request access to personal information held about you, by contacting the Data Protection Coordinator at iCare Housing CLG, 407–409 The Capel Building, Capel Street, St. Mary's Abbey, Dublin 7, D07 VK20, or by email at dpo@icarehousing.ie. Where necessary, we may ask for additional information to verify your identity or help us locate the information requested. All requests will be handled in accordance with applicable data protection legislation.

14. Right to Lodge a Complaint

If you have concerns about how iCare Housing processes your personal information, please contact us using the details below. You also have the right to lodge a complaint with the Data Protection Commission. Where possible, you may wish to raise the matter with iCare Housing first so we have an opportunity to address your concerns.

15. Transfers Outside of the EEA

iCare Housing does not routinely transfer personal information outside the European Economic Area (EEA). Where a transfer outside the EEA is necessary, we will ensure that an appropriate lawful transfer mechanism and safeguards are in place in accordance with applicable data protection law. This may include the use of Standard Contractual Clauses or another legally recognised transfer mechanism.

16. Website Use and Cookies

Information about cookies and similar technologies used on the iCare Housing website is provided in our website data protection notice.

You can manage your cookie preferences through the cookie settings available on our website.

17. Contact Details

If you have any questions about this notice, how iCare Housing processes your personal information, or your data protection rights, please contact the Data Protection Coordinator by email at dpo@icarehousing.ie or by post at iCare Housing CLG, 407–409 The Capel Building, Capel Street, St. Mary's Abbey, Dublin 7, D07 VK20.