

## Data Protection Privacy Notice for Job Applicants

1. This privacy notice tells you how we use your information, which you provide to us during the recruitment and selection phase of our relationship and confirms that your Data Controller is Frank Glennon Limited / Frank Glennon (Life & Pensions) Limited (“we”, “us”, “our”), Charlemont House, Charlemont Place, Dublin 2. Email: [info@glennons.ie](mailto:info@glennons.ie).
2. Our Data Protection Officer is contactable by email at: [dataprotection@glennons.ie](mailto:dataprotection@glennons.ie) or write to The Data Protection Officer, Frank Glennon Limited, Charlemont House, Charlemont Place, Dublin 2.
3. This Data Privacy Notice (Notice) is an important document. Please read it carefully. It is also available on our website at [www.glennons.ie/data-protection-privacy-notice/](http://www.glennons.ie/data-protection-privacy-notice/). If you would like a printed copy, please contact [dataprotection@glennons.ie](mailto:dataprotection@glennons.ie) and we will send you a copy.
4. “Data Controller” and “Personal Data” have the meaning given in the General Data Protection Regulations 2016.
5. We are subject to all applicable data protection and privacy laws when processing your personal data. Further, we shall ensure that any third party with whom we share your personal data with under 6.6(g) below are also subject to the same applicable data protection and privacy laws.
6. **How and Why We Use Your Personal Information**
  - 6.1. Personal data provided by you or by others will be used by us, to assess your application for employment at Glennon (or any affiliated Glennon entity), to verify your information and conduct reference checks, and to communicate with you in respect of your application and inform you of further career opportunities.
  - 6.2. Should you be unable to provide us with the required personal data, we will be unable to process your job application.
  - 6.3. We will use and share certain personal data in order to process your job application and to take steps prior to entering into a contract of employment. The following processing activities are used for this legal purpose:
    - (a). Assessing, verifying and validating your job application,
    - (b). Arranging and administering the interview process,
    - (c). Making an offer of employment,
    - (d). Finalising the onboarding process,
  - 6.4. We will use and share certain personal data so as to comply with certain legal obligations and regulatory requirements. The following processing activities are used for this legal purpose:
    - (a). Conducting fitness and probity due diligence checks (where required) in compliance with Central Bank of Ireland Fitness & Probity Standards.
    - (b). To comply with laws and regulations,
    - (c). To make back-ups of your data in case of emergencies and for disaster recovery purposes.
  - 6.5. We will use and share certain personal data for legitimate business interests. The following processing activities are used for this legal purpose:
    - (a). Risk management, auditing and the provision of legal advice which are key governance functions to protect our business,
    - (b). Checking information provided ensures accuracy which contributes to effective administration of our Recruitment and Selection Procedures,
    - (c). Prevention and detection of fraud to help protect the business and the insurance market,
    - (d). We may record or monitor calls for regulatory, training and quality purposes,
    - (e). We may also share with or seek information from a number of external parties in order to administer your job application and to prevent and detect misrepresentations and fraud. For example:
      - 6.5.e.1. Referees you have provided or previous employers you have listed to verify the information you have provided and protect against non-disclosure,
      - 6.5.e.2. Anyone authorised to act on your behalf,
      - 6.5.e.3. As a result of our legal and regulatory obligations. This can include with An Garda Síochána, other official agencies and on foot of a Court Order or Subpoena,
      - 6.5.e.4. Our subsidiary companies with whom the vacancy may be located.
      - 6.5.e.5. Medical practitioners, solicitors and other firms as part of the recruitment and selection process,
      - 6.5.e.6. With prospective sellers or buyers in the event that we decide to sell or buy any business or assets.
- 6.6. Where we obtain data from the above sources, the categories we obtain will be personal data relating to employment.
- 6.7. We may need your consent for the processing of certain data and in these cases, we will inform you of such processing and the reason for this at the time consent is captured.
- 6.8. In order to process your job application, we may share your personal information with third parties as set out in 6.5(e) above and on occasion, some of your personal information may be sent to third parties outside of the European Economic Area (EEA). We would only do this in compliance with the appropriate legal and technical safeguards such as the standard data protection clauses adopted by the European Commission; as a result of an adequacy decision of the European Commission; or where the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and another natural or legal person; for example your employer in a Non-EEA country.
- 6.9. In all of these processing activities, your interests are considered and we ensure that necessary safeguards are in place to protect your privacy, such as contracts in place with third parties, restricted access to data, regular testing and evaluation of technical and organisational security measures, retention limitations etc.
7. **Representation**
  - 7.1. The accuracy of the personal data you provide to us is paramount to the processing of your job application.
  - 7.2. Accordingly, when you provide us with personal data, you warrant and represent to us that in respect of any personal data of any data subject which you provide to us you have the authority of the relevant data subject(s) to disclose such personal data to us and that all such data is accurate, complete and up to date.
8. **How Long We Keep Your Personal Information**
  - 8.1. Information submitted for a job application, which does not result in the issue of an invitation to interview for the position, may be retained by us for a period of up to 6 months from the date of the job application.
  - 8.2. All information in respect of a job application, which does result in the issue of an invitation to interview for the position but does not result in the acceptance of an offer of employment, may be retained by us for a period of up to 2 years from the date of the last interview.
  - 8.3. All information in respect of a successful job application, one which results in the issue and acceptance of a contract of employment to include all documentation and call recordings will be held for 7 years after the ending of our Employer/Employee relationship to ensure we meet our regulatory obligations.
9. **Your Rights In Relation To Your Personal Information**
  - 9.1. You have the right to request a copy of your personal data, and to have incorrect personal data about you corrected.
  - 9.2. Where we required your consent to process your personal data you have the right to withdraw your consent for such processing.
  - 9.3. You also have the right to have your personal data erased, object to certain processing activities, or to have the processing restricted.
  - 9.4. You have the right to data portability in certain circumstances.
  - 9.5. If you would like to exercise any of these rights, please email a request to [dataprotection@glennons.ie](mailto:dataprotection@glennons.ie) or write to us at the address contained in Section 2 of this notice. To ensure that we do not disclose your personal information to a party who is not entitled to it, when you are making the request please provide us with:
    - (a). Your name;
    - (b). Address(es);
    - (c). Date of birth;
    - (d). Any reference numbers that you have along with a copy of your photo identification and proof of address.
  - 9.6. All requests are free of charge although we reserve the right to charge an administrative fee for subsequent requests (such as when the request is part of a series of repeated requests over a short period of time).

- 9.7. We endeavour to respond within one month from receipt of the request. If we do not meet this time frame, we will explain why this was in our response.
- 9.8. Please note that simply submitting a request does not mean we will be able to fulfil it – we are often bound by legal and legislative obligations which can prevent us fulfilling some requests in their entirety, but when this is the case we will explain this to you in our response.
- 9.9. Please note also that exercising some of the above rights may lead to us being unable to continue to process your job application, but when this is the case we will explain this to you in our response.
10. **Automated Decision Making**
  - 10.1. No processing activities related to your job application involve the use of automated (computer based) decision making.
11. **How can you lodge a complaint?**

If you wish to raise a complaint on how we have handled your personal information, please send an email to **dataprotection@glennons.ie** or write to us using the address provided in Section 2. Our Data Protection Officer will investigate your complaint and will give you additional information about how it will be handled. We aim to respond in a reasonable time, normally 30 days.

  - 11.1. If you are not satisfied with our response you can lodge a complaint to the Office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois or via their website at [www.dataprotection.ie](http://www.dataprotection.ie).
12. **Up To Date Information**
  - 12.1. In order for us to keep your information accurate and up to date, please contact us if any of your details change during the recruitment and selection process.
13. **Changes to our Data Protection Notice**
  - 13.1. This notice will be updated from time to time so please check it each time you submit personal information to us.
14. **How do you ask a question about this Data Protection Notice?**
  - 14.1. If you any questions or comments about this privacy notice please contact The Data Protection Officer, Frank Glennon Limited, Charlemont House, Charlemont Place, Dublin 2.
  - 14.2. You may also email us at **dataprotection@glennons.ie**.