

An Post Insurance Candidate Privacy Notice

1. Overview of this Notice and who we are

Purpose

An Post Insurance is registered as a "data controller" on Irish Data Protection Commissioner's register when processing your information. We are responsible for deciding how we hold and use personal information about you. We are providing you with this Privacy Notice because you have applied for a position within our company. This notice informs you of how and why your personal data will be used, namely for recruitment purposes, and how long that data will be retained for.

An Post Insurance values and cares about your privacy and is committed to processing your personal information in accordance with fair information practices and the applicable data protection laws, General Data Protection Regulation (GDPR), the Irish Data Protection Acts 1988 – 2018.

We will comply with data protection laws and principles, and ensure that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Who we are

One Direct (Ireland) Limited, trading as An Post Insurance, is regulated by the Central Bank of Ireland. One Direct (Ireland) Limited is a wholly owned subsidiary of An Post. Registered in Ireland Number 452399. Registered Office: GPO, O'Connell St., Dublin 1. D01 F5P2.

Our designated Appointed Person is Becky Hand, who can be contacted at careers@anpostinsurance.ie.

2. Definitions

2.1. **Controller**

means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

2.2. **Personal Data**

means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical,

physiological, genetic, mental, economic, cultural or social identity of that natural person;

- 2.3. **Special Category Data** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;
- 2.4. **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 2.5. **Processor** processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

3. Legal basis under which An Post Insurance processes your personal information

We rely upon Article 6 1 (b) GDPR for the purposes of processing your personal data as part of the recruitment process. This processing is necessary as part of the application process to assess your suitability, prior to a potential offer of employment and any subsequent contract with you.

All information is provided on a voluntarily basis and you determine the extent of information that you provide to An Post Insurance. Please note however, that if you fail to provide personal data when requested, which is necessary for us to consider your application or for onboarding purposes, we may not be able to process your application further. For example, if your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the Ireland, complete a pre-employment medical questionnaire and provide satisfactory references.

4. The kind of information we hold about you

When you apply for a job at An Post Insurance, we will ask you to provide us with personal information about yourself so we can evaluate your application. You may also provide us with your personal information that we have not specifically requested (for example, your CV may contain sensitive personal information, information about your hobbies and social preferences). We will collect, store, and use the following categories of personal information about you:

- The information you provide to us in your CV, online application form (where applicable) and/or covering letter including name, address, telephone number, personal email address, employment history, qualifications, achievements and employment preferences.
- Current and previous employment details (including position/s held, work experience, employment references).

- Background information such as your educational background including degrees, certificates, transcripts, credit history and/or criminal background screenings (where relevant to your application and permitted under applicable law).
- Financial information - such as salary, tax information, benefits, expenses, company allowances, desired salary and other terms relating to compensation and benefits packages).
- Results of any pre-employment testing, including any information provided through online assessments or interview assessments carried out by the Company or a nominated third party.
- Languages spoken and level of proficiency if applicable to the role.
- Job preferences.
- Contact information for your personal and professional referrals.
- Information that you voluntarily submit to us in support of an application and/or the application and recruitment process.
- Information relating to any previous applications you may have made to An Post Insurance and/or any previous employment history with An Post Insurance.
- Any information you provide to us during an interview.

Sensitive Personal Information: At the recruitment stage, An Post Insurance usually does not request or require information regarding civil status, religion, sexual orientation, date of birth, gender or political affiliation in connection with your application. If you provide this information, it will not be considered in the hiring or selection process. To the extent that you provide us with sensitive personal information (race, ethnicity, political opinions or beliefs, membership of a trade union or political party, physical or mental health information, sexual orientation or information related to criminal convictions or offences), you expressly authorise the Company to handle such information in accordance with this Privacy Notice.

If you have a disability and would like for us to consider an accommodation, you may provide that information during the recruitment process.

We may also collect (depending on the role you apply for), store and use the following "special categories" of more sensitive personal information in so far as we are permitted by Law to do so:

- Information about criminal convictions and offences.
- Subsequent to any offer of employment, we will use information you provide via our medical questionnaire, to consider whether we need to provide appropriate adjustments or accommodations or to inform our Health and Safety Programme.
- Information relating to your Fitness and Probity so that we might comply with our regulatory obligations.
- Documentation provided by you, such as passports or driving licences for example, to confirm your identity and/or ability to work in this jurisdiction.

Generally, this information will only be requested if you are provided with an offer of employment.

We will process the above data to help us carry out our obligations as an employer and will fully comply with all relevant legislation.

3. How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Via a Recruitment Agency from whom we collect the following categories of data: Name, job title, employment history, qualifications, achievements and other interests.
- Any referees provided by you from whom we collect the following categories of data: full name, position/s held, period of employment, performance/attendance/conduct during employment.
- From publicly assessable sources such as LinkedIn etc.

4. 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 employment.
- Carry out background and reference checks, where applicable.
- Communicate with you in relation to your application and the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

5. Automated decision-making

You will not be subject to a decision based solely on automated processing as part of the recruitment process.

6. Data sharing

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR Department, relevant hiring managers and interviewers involved in the recruitment process, and IT staff if access to the data is necessary for the performance of their roles.

We will only share your personal information with the carefully selected third parties for the purposes of processing your application or job offer. We do not permit any third party service providers to use your personal data for their own purposes. Any processing is for specified purposes only and in accordance with our instructions.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

7. Data security

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. Details of these measures may be obtained within our Data Protection Policy which is available upon request.

8. How long will you use my information for?

We keep your data only for as long as it is needed for the purpose for which your data was processed unless further retention is required to satisfy our legal, regulatory or other obligations or to protect our interests.

If your application is unsuccessful, we will retain your personal information for a period of 13 months after we have communicated our decision to you. This is so that we can show, in the event of a legal claim, that we have not discriminated you and that we have conducted the recruitment exercise fairly. After this period, we will securely destroy your personal information.

If you are a successful candidate and accept employment with us, some or all of the personal data we obtained during the recruitment process will become part of your employment record and will be held for longer on your personnel file. This data will then be subject to our separate Data Privacy Policy for employees.

9. Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information.
- **Request correction** of the personal information that we hold about you.
- **Request erasure** of your personal information.
- **Object to processing** of your personal information.
- **Request the restriction of processing** of your personal information.
- **Request the transfer** of your personal information to another party.

If you have a concern in relation to the processing of your personal information or in connection with your rights as outlined above, we encourage you to contact the HR Department (HR@postinsurance.ie).

You have the right to make a complaint at any time about how the company processes your personal information to the Data Protection Commission (www.dataprotection.ie) whose address is Canal House, Station Road, Portlaoise, Co Laois, R32 AP23.

10. Your responsibilities

You are responsible for the information you provide to An Post Insurance and that it is honest, truthful, accurate and not misleading in any way. If you provide information concerning any other person such as individuals you provide as references, you are responsible for providing any notices and ensuring your referee consents to An Post Insurance collecting and processing that information as described in this Privacy Notice.

11. Review

An Post Insurance will only use your personal information in the manner described in this Privacy Notice. However, we reserve the right to change the terms of this Privacy Notice at any time by posting revisions to our website. If at any time, we decide to use your personal information in a manner that is different from that stated at the time it was collected, you will be given reasonable notice. This Notice was last updated on **4th September 2019**.