

Data Protection & Privacy Policy – Candidates for Recruitment

Introduction

Woodgate & Clark takes your privacy very seriously. This Privacy Policy tells you, in broad terms, how We use the Personal Data that we collect from You in relation to your job application.

Please read the information contained within this document carefully. By proceeding with your application, you are deemed to have accepted the information contained within the Privacy Policy.

Any personal information you supply to Woodgate & Clark Limited will be treated in accordance with the Data Protection Act 2018 and other legislation intended to protect your personal information and privacy.

Definitions

“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.

“Special Categories Data” means information relating to an identified or identifiable natural person (Data Subject) of a special nature including, but not limited to, medical data, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, sex life or sexual orientation.

“Data Subject” means the identified or identifiable living individual to whom personal data relates.

“Processing” in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as: collection, recording, organisation, structuring or storage; adaptation or alteration; retrieval, consultation or use; disclosure by transmission, dissemination or otherwise making available; alignment or combination; or the restriction, erasure or destruction.

“Data Controller” an organisation or a person who, alone or jointly with other persons, determines the purposes and means of the processing of personal data.

“Data Processor” an organisation or person, other than an employee of the controller, who processes data on behalf of the controller.

“We/Us/Our” means Woodgate & Clark Limited.



What data do we collect?

The personal information Woodgate & Clark collects may include details such as your name, e-mail address, postal address, and telephone number. We are the Data Controller for the data you submit under your job application. We will also collect information around your previous work experience, education and any other information you have provided.

We will only process personal data that is necessary for the purposes of assessing your suitability for the role you have applied for, and any other similar roles open at Woodgate & Clark that you may be suitable for. This information includes, but is not limited to:

- Your name and address, nationality, contact details such as e-mail and telephone number/s, professional licenses and affiliations, employment history and education history.
- Reference information if provided, including the names and contact details of individuals you have listed as a reference.
- You may also be asked to provide details about any reasonable adjustments you require if you are invited for an interview.
- Any information you have voluntarily provided including details about your salary and employment package.
- Information made publicly available including via social media (Please note that Woodgate & Clark's Facebook page may be utilised).

Why do we collect your data?

The personal data we collect from you in relation to your job application is used to assess your suitability for roles here at Woodgate & Clark.

To be able to assess your suitability for any roles here at Woodgate & Clark, we will need to process your information. The information will consist of the personal data given to us by you and any publicly held information. It will also include any personal data collected by us from you or other parties throughout the application process, including information provided by your references or our vetting service. We will only collect this information in accordance with the data protection principles and definitions.

Purpose and Lawful basis

Purpose of processing	Lawful Basis
Communicate with you in relation to your application	Legitimate Interest
Make decisions about your suitability for the role	Legitimate Interest
Provide reasonable adjustments for interview/assessment purposes.	Legitimate Interest
Check employment history and education history	Legitimate Interest

Special Category Data

Special category data, as defined above, will only be collected to provide reasonable adjustments for interview or assessment purposes. The data will be held by the Talent Acquisition Team in the strictest confidence and will not be shared with the interviewer unless you advise this should be shared.

Reasonable adjustment information, however, will be provided to the interviewer to ensure they are



able to accommodate the adjustment during your application process. The Article 9 basis for processing special category data is: 9(2)(b) Obligations in field of employment/social security.

Consent & Implied Consent

If there are any circumstances where we believe that we may need your consent to process your information in a certain way, we shall ask you for your consent using a “consent form”. If you do give consent, then you may withdraw your consent again later. Under GDPR, consents must be unbundled. This means that individual consent requests must be provided separately from documents such as recruitment packs. The consent form will be retained on file for a specified period that we require the consent for.

- We may process your personal information as a candidate where it is necessary:
- To enable us to comply with our legal obligations as an employer (or potential employer).
- To enable us to comply with our other legal obligations as an organisation (such as our legitimate contracts or any regulatory requirements).
- To protect your vital interests, or those of another individual (i.e. protection of life)
- Where we, or another person/organisation, have other legitimate interests for doing so (so long as your own fundamental rights do not override them).

Your Personal Data will:

- only be collected where we have lawful grounds and legitimate business reasons to do so,
- be dealt with in a transparent and legitimate manner,
- only be obtained and processed for the purposes of dealing with your application and will only be used for recruitment purposes.
- be corrected/updated if you inform us or if we discover that your details have changed or that they are incorrect,
- be retained through appropriate organisational and technological measures,
- be securely deleted at the end of the appropriate retention period defined us in this Privacy Policy and in compliance with privacy legislation.
- Will only be shared with those within Woodgate & Clark who require the information to process the application (e.g. hiring manager, HR department).

Retaining your data

For unsuccessful candidates your data will be retained on file for 6 months following the deadline for applications. Following the 6-month period your details will be deleted from our system. Should you not wish to be considered for other roles please let us know using the contact details below and we will ensure we have removed your details from our records.

Sharing your data

As part of the initial application process, we do not share your data with any third-party organisations, however this may be shared within the Van Ameyde Group and may be shared when approaching your referees should you become a successful candidate. The data shared with the referee will be your full name and the dates you worked for the referee’s organisation. If you receive an offer of employment, Woodgate & Clark will share your information, including Name, Address and contact details with a vetting company who will then be in contact with you to progress your application.



Protecting your data

To protect your data We take all appropriate, reasonable, proportionate, technical, and legal measures. If you believe that your communications with us or the data that We have retained is no longer secure you should contact us immediately. Please see contact details below.

All possible reasonable steps are taken to ensure that your Personal Data is accurate and complete as is necessary for the performance of our services. Should you consider the data We hold is either inaccurate or no longer correct, you have the legal right to have it corrected. See contact details below.

Your rights in relation to your data

Under UK Data Protection law, you have various rights in relation to your data:

Right to be informed	You are entitled to a minimum set of information concerning the purposes for which your data is processed, which can be found in this Privacy Policy.
Right to gain access	You have the right to gain access to your Personal Data. You can submit an access request to us using the contact details below. We will then provide you with all information we have on file in relation to your job application.
Right to rectification	You are entitled to request the rectification of any errors in your Personal Data that we hold.
Right to erasure	You can request the deletion or removal of your Personal Data where there is no legal reason for us to continue processing your data.
Right to restrict processing	You have the right to request the restriction or suppression of your Personal Data. This only applies in certain circumstances and is not an absolute right.
Right to data portability	You have the right to obtain and reuse your data for your own purposes.
Right to object	You have the right to object to the processing of your personal data. However, in some circumstances there are legitimate reasons to continue that override this right.
Right to not be subject to automated decision making	You have the right not to be subject to any decision where it has been made solely based of automated processing of your personal data. You can request human intervention in these circumstances.

To exercise any of the above rights please email dataprotection@woodgate-clark.co.uk

Contact Details

If you have any questions relating to the way we process your personal data, or any questions on this privacy policy please contact us on the details below:

Address: The Data Protection Team, Woodgate & Clark Limited, 42 Kings Hill Avenue, Kings Hill, West Malling, Kent. ME19 4AJ.

Email: dataprotection@woodgate-clark.co.uk



Complaints

If you have any concerns or complaints in relation to the processing of your data, we ask that you contact us in the first instance using the contact details above, to give us the opportunity to understand the issue and see how we can address it.

In any event, you have the right to lodge a complaint with the Information Commissioners Office (ICO). To report to the ICO, please use the contact details below:

Address: Head Office, Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Phone: 0303 123 1113

Textphone: 01625 545 860

Fax: 01625 524 510

Website: ico.org.uk

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