

Co-operatives UK Candidate Privacy Notice

The short version...

We need to collect and use personal information about you in order to process your application to work at Co-operatives UK. Almost all of the personal information we will process will be collected directly from you and we will use it in the normal ways you would expect from an organisation leading a recruitment process.

- We don't use automated decision making.
- We won't collect unnecessary information about you and we will use information in a responsible and secure way.
- We will never sell your personal data
- If you do not provide the data we ask for, or if you ask us to stop processing your data we may be unable to continue with your application.

What is the purpose of this document?

In our work, we look to operate in line with international and longstanding co-operative values and this includes operating in an open and responsible way when it comes to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about candidates for roles at Co-operatives UK in accordance with the UK General Data Protection Regulation (UK GDPR).

Co-operatives UK is a 'data controller'. This means we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice applies to anyone submitting an application for a role that Co-operatives UK is recruiting. This notice does not form part of any contract of employment or other contract to provide services. If you're successful and become an employee, you'll be given more information about how we will use your personal data at that point.

Data protection principles

We will comply with data protection law which says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about a person which could identify who they are, there are some additional protections needed for more sensitive personal data. Personal data does not include data where anything to indicate someone's identity has been removed (anonymous data).

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided on our application form, including name, address, telephone number, personal email address, education history, qualifications and employment history
- Any information you provide to us during the interview process including where you request reasonable adjustments to be made to our process.
- Photo ID or your proof of entitlement to work in the UK
- The answers to our equal opportunities questionnaire – please note that this form is anonymous and none of the questions are mandatory.

This may involve us collecting, storing and using the following types of more sensitive personal information:

- Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions.
- Evidence of your right to work in the UK/immigration status
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences. Please note that we only complete DBS and criminal records checks in exceptional circumstances, where it is relevant to the specific role.

How is your personal information collected?

We normally collect personal information about candidates directly from them. This will be through the application and recruitment process. We may also collect personal information about you from:

- your recruitment agency if our recruitment process involves this,
- the Disclosure and Barring Service in respect of criminal convictions where you are applying for a role where this information is relevant,
- your named referees, who we will ask to confirm the dates that they were your employer, your key responsibilities and reasons for leaving.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

How we will use information about you

During recruitment, Co-operatives UK needs to keep and process information about you for normal purposes. The information we hold and process will only be used for our management and administration. We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Making a decision about your recruitment or appointment – your entitlement to work in the UK and to set your employment terms
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract of employment with you. Having received your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. 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 role. If we decide to offer you the role, we will then take up references and may in exceptional circumstances carry out a criminal record check before confirming your appointment.

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.

We may sometimes need to process your data to pursue Co-operatives UK's legitimate interests, for example to prevent fraud or to report potential crimes. We will never process your data where your own interests override Co-operatives UK's legitimate interests.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, trade union membership or criminal convictions, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. Where appropriate we will use your particularly sensitive personal information in the following ways:

- We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process.
- We use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.
- We use information about your immigration status as part of our checks on your entitlement to work in the UK.
- We may collect and process information about unspent criminal convictions during the recruitment process, or if such information arises during your employment. This helps us assess your suitability for the role and to meet our legal and regulatory obligations. We do not carry out criminal records checks unless required for specific roles or by law.

We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

Is your consent needed?

We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law.

We do not need your consent where the purpose of the processing is to protect you or another person from harm or to protect your well-being and if we reasonably believe that you need care and support, are at risk of harm and are unable to protect yourself.

Data sharing

We will, in some circumstances, have to share your data with third parties; if we are legally obliged to or where we need to in order to complete the recruitment process eg to obtain references from your previous employer. We require third parties to respect the security of your data and to treat it in accordance with the law.

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. In addition, we limit access to your personal information to those who have a business need to know it. Your response to our equal opportunities form is anonymous and therefore does not meet the definition of personal data.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we would like to retain your personal information on file, on the basis that we might be able to consider you for an opportunity that may arise in future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period for that purpose.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- **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 corrected.
- **Request erasure** 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).
- **Object to processing** 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.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us using the details at the end of this notice.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, in line with legislation, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances, you would be informed of this decision.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other 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.

Right to withdraw consent

In circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Co-operatives UK, using the details at the end of this notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Responsible Person

Zena King - Senior Governance Advisor is our data protection lead and oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our data protection lead. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

If you have any questions about this privacy notice or our data protection processes, please contact us: By email: data@uk.coop

By phone: 0161 2141 750

In writing: Data Protection Lead, Co-operatives UK, Holyoake House, Hanover Street, Manchester, M60 0AS

Version history information:

Date approved by LT	Commentary
24 February 2026	Policy created to separate out privacy notice specifically for recruitment candidates.