

What is the purpose of this document?

Scotland's Charity Air Ambulance ("SCAA", "we", "our", or "us") is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, volunteer, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those 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.

The kind of information we hold about you

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

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment or volunteer history, skills/experience, interests, qualifications, if you

or family member or friend been airlifted by SCAA, and if you hold a UK drivers licence.

- Any information you provide to us during the recruitment process and/or the interview.
- If you contact us, we may keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.
- Emergency contact details and/or next of kin.
- Information about your right to work in the UK.

We may also collect, store and use the following types of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect the following categories of data: name and contact details, CV or application form (where applicable), any details you provide to such recruitment agencies such as information related to your candidate account/profile.
- Background check agencies or providers such as DVLA or Disclosure Scotland, from which we collect the following categories of data: Contact details, identity documents such as a driving license or passport, address history, any information you may provide to undertake the check, right to work information, and information about criminal convictions.
- Your named referees, from whom we collect the following categories of data: contact details of the referee and any information they may provide to us about you.

- Data from third parties that is from a publicly accessible source such as jobsites or databases. We may also receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our charity more generally.

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 the role you have applied for or for other roles.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To verify your identity and carry out background and reference checks, where applicable.
- To verify that candidates are suitable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We rely on legitimate interests as the lawful basis to process your personal data in order to facilitate the recruitment process and to decide whether to appoint you in the role. Our legitimate interests are the recruitment of staff or volunteers for our charity.

We also need to process your personal information to decide whether to enter into a contract of employment with you or a volunteer contract.

Having received your CV and covering letter or your application form (as applicable) 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/or carry out a criminal record check before confirming your appointment.

If you fail to provide personal information

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. For example, if we require a background check

or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use information about your health conditions or disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made to the interview.

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- In limited circumstances, with your explicit written consent.
- Where it is necessary for the purposes of carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

In addition, we rely on processing conditions at Schedule 1, Part 1, paragraph 1(1)(a) and Schedule 1, Part 1 paragraph 2(2)(a) of the Data Protection Act 2018. These relate to the processing of special category data for employment purposes and for social protection purposes including making reasonable adjustments to support your volunteering/working with us. We do so in accordance with our Appropriate Policy Document.

Information about criminal convictions

For some roles we may require to obtain a Disclosure Scotland check for the purposes of protecting vulnerable groups. To the extent we will collect any criminal conviction data when doing this, we will do so in line with our Data Protection Policy and Appropriate Policy Document. In some other cases this information is provided to us by third parties that may contact us and when this happens we will ensure we handle this in line with applicable data protection law.

Do we need your consent?

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your volunteering/working with us that you agree to any request for consent from us.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might you share my personal information with third parties?

As set out above we share your personal information with the following third parties for the purposes of processing your application: where required by law or a regulator, in the event of a restructure of our Charity, our third-party services providers (such as our volunteer management system or HR System), background check providers, referees, or professional advisors. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Transferring personal data outside the UK

We may transfer, store, and process your personal data outside the UK using legally-provided mechanisms to lawfully transfer data across borders.

We transfer personal data to and from the UK to Canada based on the adequacy decision the UK has adopted.

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 employees, agents, contractors and other third parties who have a need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office (ICO) of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

Where you are unsuccessful, we will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to 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.

We also keep your personal information for this period in case, in the event you were unsuccessful, a further opportunity may arise and we may wish to consider you for that. After this period, we will securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations. However if you are successful, we may keep a copy of your recruitment information and we will inform you of how we will process that in our employee privacy notice.

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 lawfully processing it.
- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **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 exercise your rights, please contact our data protection officer (DPO) on dpo@SCAA.org.uk.

Right to withdraw consent

Where you provided consent to us processing your personal information, you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the DPO on dpo@SCAA.org.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for that purpose. Although this will not affect the lawfulness of any processing carried out before the withdrawal.

Data protection officer

We have appointed a DPO to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO on dpo@SCAA.org.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK.