

Under Data Protection legislation (GDPR), individuals have a number of rights in relation to the personal data an organisation holds about them. The purpose of this notice is to inform job applicants of the type of personal data that Irish Lights retains, the purpose for which it is kept and individuals' rights relating to personal data processed. Should an employment offer be made, a further privacy notice will be provided detailing how such data is used for the purposes of managing the employment relationship.

What personal data does Irish Lights process about applicants?

From the point at which we receive an application for employment, Irish Lights will need to maintain and process data about applicants for the purposes of assessing and communicating a recruitment decision. Such data is normally retained for 12 months following completion of a recruitment competition.

At the recruitment stage, applicants are requested to submit a cover letter and CV. On some occasions, a candidate may also be asked to submit a presentation on a specified work-related topic. Data obtained includes the following:

- Name and contact details including email address, phone number
- Applicant's work history
- Applicant's education history
- Qualifications and experience relevant to the role
- Eligibility to work in the EU/EEA (if applicable)
- Contact details for referees: previous employer(s) and/or educational referees

Unsolicited CVs will only be accepted by the ILV Granuaile where they will be held with your consent for a period of 12 months. If a suitable vacancy does not arise during this time, the CV will be confidentially destroyed.

Unsolicited CVs will not be accepted in any other area of Irish Lights and any received will be immediately and confidentially destroyed.

Are applicants obliged to provide personal data?

Applicants are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if the information is not provided, the organisation will be unable to process the application.

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Selection Process – Short-listing stage:

Information provided by the applicant will be used to assess their suitability for interviewing. This will be done through a process of reviewing the information provided by the applicant against the requirements of the role. The most suitable candidates, based on the job specification, are selected for the interview stage.

Selection Process – Interview stage:

Applicants may be invited to interview(s) for a role following the short-listing process. The data generated at this stage of the process will be as follows:

- Interview details including notes & assessment of the interview board, dates and times
- A record of candidates' arrival to and departure from the building for Health and Safety purposes
- Communication of the recruitment decision

What is the lawful basis for processing personal data and how long will it be retained for?

As part the recruitment process, Irish Lights collects and processes personal data relating to job applicants. Irish Lights is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. Much of the information held will have been provided by applicants, but some may come from external sources such as referees.

The information processed will be used for recruitment management & administrative use only. It will be used to enable Irish Lights to manage the relationship with applicants effectively, lawfully and appropriately, during the recruitment and selection process and/or the employment relationship. This includes using information to enable Irish Lights to comply with the employment contract, to comply with any legal requirements and to pursue legitimate interests.

Irish Lights processes health information, with consent, if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

In order for the Irish Lights to be able to demonstrate the legal integrity of its selection process, data is retained for 12 months.

Who has access to an applicant's data?

Data will be shared for the purposes of the recruitment process. This includes members of the HR team, interviewers involved in the recruitment process and managers in the relevant business area.

Do Irish Lights share personal data with any third parties?

Irish Lights interview panels may include an external panel member. The data of shortlisted applicants will be shared for the purposes of interviewing and evaluation. Interviewers are required to return all hardcopy interview documentation to the Irish Lights HR representative on the panel and to confirm deletion of any copies and any electronic applicant data provided.

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Irish Lights internal and external auditors may request sight of recruitment decisions supporting documentation to verify that recruitment decisions are made in line with Irish Lights policy and legal requirements. Such documentation may contain personal data relating to candidates. HR will ensure that data is managed securely and in accordance with data protection principles.

Irish Lights may contact referees following interviews. This is on the basis of the referee information provided by the candidate. **Irish Lights will seek information from third parties only when a conditional job offer has been made and will inform an applicant that it is doing so.**

Recruitment Management System

Irish Lights uses an online Recruitment Management System (product of irishjobs.ie) to process online applications and has a formal data protection agreement in place with the provider to ensure that specific data protection guarantees are in place. **Recruitment processes are not based on automated decision-making.**

Data subjects have the following rights and can:

- access and obtain a copy of their data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of their data where the organisation is relying on its legitimate interests as the legal ground for processing;
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not their interests override the organisation's legitimate grounds for processing data.

If an applicant wants to exercise any of these rights, they must contact the Irish Lights Data Protection Officer – see below.

Making a Subject Access Request

Subject Access Requests can be submitted in writing to the Irish Lights Data Protection Officer, Robert Hudson, Harbour Road, Dun Laoghaire or DPO@irishlights.ie

What are the timeframes for dealing with personal data access requests?

- Within 30 days of receipt of the request
- The 30 day period may be extended by 2 months, where necessary, taking into account the complexity and number of requests. Applicants will be informed of any extension and the reasons within 30 days of receipt of the request. If action is not taken on foot of a request, applicants will be informed without delay and, at the latest, within 30 days of receipt of the request, of:
 - The reasons for not taking action
 - The possibility of lodging a complaint with the Data Protection Commission (see below).

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In order to facilitate processing of a request and timely retrieval of personal data, Irish Lights will ask that individuals provide the following details:

- Name of Requester
- Details of the personal data they are requesting
- The Data Subject Right the applicant wishes to exercise (where applicable) e.g., right to rectification, erasure, etc
- Any other relevant information

Identification

In order to ensure that personal data is not disclosed to the wrong person, proof of identity will be required with all data access requests. If a request is being made on an applicants behalf by a third party such as a solicitor, authority and verification will be sought.

Data pertaining to an applicant's data only

Applicants are entitled to their own data only. If data from additional parties to the request are required, it is necessary for each party to consent to the release of their personal data in writing to the Data Protection Officer. Data pertaining to individuals not party to the request will not be released.

Charges

Requests are dealt with free of charge. However, where requests from a data subject are considered 'manifestly unfounded or excessive' (for example where an individual continues to make unnecessary repeat requests or the problems associated with identifying one individual from a collection of data are too great) the data controller may:

1. Charge a reasonable fee, taking into account the administrative costs of providing the information/ taking the action requested; or
2. Refuse to act on the request.

Right to lodge a complaint to the Supervisory Authority

Under data protection legislation an individual has a right to lodge a complaint with the Data Protection Commission if they consider that processing of their personal data is contrary to the GDPR. The contact details of the Commission are info@dataprotection.ie

Data Protection Commissioner, Canal House, Station Road, Portarlington, Co. Laois. The Data Protection Commissioner also operates a helpdesk function, which is contactable at 0761 104 800 or LoCall 1890 252231.

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