



Emerald Green Specialist Education & Consultancy

Candidate Privacy Notice

Last Updated: September 2026

This Candidate Privacy Notice ("Notice") explains how **Emerald Green Specialist Education and Consultancy Ltd** ("we", "us", or "our"), as a **Data Controller**, collects, uses, discloses, and protects the personal data of job applicants and candidates ("you") during our recruitment and hiring process.

This notice complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

1. Data Protection Principles

We comply with UK data protection law, which requires that the personal data we hold about you must 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.

2. The Information We Collect About You

We collect and process a range of personal data about you before, during, and after the recruitment process:

A. Information You Provide Directly

- **Contact Details:** Name, title, personal address, personal email address, and telephone number.
- **Application Documents:** Resumes, CVs, cover letters, application forms, and portfolio samples.
- **Professional History:** Work history, employment records, qualifications, certifications, memberships, and professional references.
- **Interview Data:** Interview notes, responses to assessments or test tasks, and audio/video recordings (where applicable and with prior notice).
- **Work Authorization:** Proof of your right to work in the UK (e.g., passport, share code, or visa documentation).

B. Special Category Personal Data

Where permitted by law, we may collect and process sensitive personal data:



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- **Diversity & Inclusion Data:** Information about your race, ethnicity, sexual orientation, or religious beliefs, collected strictly on a voluntary basis for equal opportunities monitoring.
- **Health & Disability Data:** Information about health conditions, physical/mental disabilities, or medical needs to make reasonable adjustments during the interview process or workplace access.

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C. Information Collected from Third Parties

- **References:** Professional feedback from former employers or character referees.
- **Background Checks:** Verification of qualifications and employment history. Where relevant and proportionate to the role, we may conduct criminal record checks via the **Disclosure and Barring Service (DBS)**.

3. Lawful Bases for Processing

Under the UK GDPR, we must have a valid legal ground to process your personal data. We rely on the following lawful bases:

Purpose of Processing	Categories of Data	Lawful Basis (UK GDPR)
Evaluating suitability: Assessing qualifications, experience, and shortlisting candidates.	Contact details, CV, references, interview notes.	Legitimate Interests: Identifying and hiring qualified personnel to run our business.
Communication: Scheduling interviews, providing updates, and extending offers.	Contact details, correspondence.	Pre-Contractual Steps: Taking steps at your request prior to entering an employment contract.
Right to Work checks: Verifying your legal entitlement to work in the UK.	Passports, visas, right-to-work share codes.	Legal Obligation: Complying with UK immigration laws (e.g., Immigration, Asylum and Nationality Act 2006).



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Equal opportunities monitoring: Tracking diversity statistics across applicants.	Diversity data (ethnicity, gender, etc.).	Explicit Consent OR Article 9(2)(b) UK GDPR (Employment and social security law requirements).
Reasonable adjustments: Accommodating candidates with disabilities during interviews.	Health or disability data.	Legal Obligation: Complying with the Equality Act 2010.
Future opportunities: Retaining your profile for future open roles.	CV, contact details, application.	Consent: Requested separately if your application is unsuccessful.

4. Criminal Record Information (DBS Checks)

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where the law permits us to do so.

Where applicable, we process criminal record data under **Section 10 and Schedule 1 of the Data Protection Act 2018** to meet our statutory requirements or for reasons of substantial public interest (such as safeguarding).

5. How We Share Your Information

We do not sell your personal data. We share your information internally and with select third parties strictly on a need-to-know basis:

- **Internal Recruitment Team:** Hiring managers, HR staff, and interview panel members.
- **Data Processors:** Third-party service providers bound by data processing agreements, including:
 - Applicant Tracking System (ATS) providers.
 - Background check and DBS screening vendors.
 - Video interviewing platforms and technical assessment providers.
- **Referees:** To verify your employment history and qualifications.
- **Legal & Regulatory Bodies:** The UK Home Office, HMRC, or law enforcement entities when required by legal obligation or court order.



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6. International Data Transfers

Where your personal data is transferred outside the UK (for example, if our Applicant Tracking System servers are hosted overseas), we ensure an adequate level of protection is maintained by using UK-approved safeguards:

- Transfers to countries covered by **UK Adequacy Regulations** (e.g., the EEA).
- Execution of the UK's **International Data Transfer Agreement (IDTA)** or the **UK Addendum to the EU Standard Contractual Clauses (SCCs)**.
- Participation in certified frameworks, such as the **UK Extension to the EU-US Data Privacy Framework**.

7. How Long We Retain Your Data

- **If your application is successful:** The information collected during recruitment will be transferred to your personnel file and governed by our **Employee Privacy Notice**.
- **If your application is unsuccessful:** We will retain your personal data for **6 months** following the date we communicate our decision to you. This enables us to defend against potential legal claims (e.g., under the Equality Act 2010).
- **Future Talent Pools:** If you explicitly consent to us keeping your CV on file for future opportunities, we will retain your data for **[e.g., 12 to 24 months]**, after which we will delete it or re-request your consent.

At the end of the retention period, your data will be securely destroyed or permanently anonymized.

8. Your Legal Rights Under UK GDPR

As a data subject in the UK, you have specific rights regarding your personal data:

- **Right of Access:** You can request a copy of the personal data we hold about you (a Data Subject Access Request or "DSAR").
- **Right to Rectification:** You can ask us to correct inaccurate or incomplete data.
- **Right to Erasure ("Right to be Forgotten"):** You can ask us to delete your personal data where there is no lawful reason for us to continue processing it.
- **Right to Restrict Processing:** You can ask us to suspend processing your data in certain scenarios (e.g., while disputing its accuracy).
- **Right to Data Portability:** You can request the transfer of structured data to yourself or a third party.
- **Right to Object:** You can object to processing based on legitimate interests.
- **Right to Withdraw Consent:** Where we rely on your consent (e.g., storing your CV for future roles), you may withdraw it at any time.

To exercise any of these rights, please contact us using the details below. We will respond to valid requests within **one calendar month**.



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9. Contact & Complaints

If you have questions about this notice or wish to exercise your rights, please contact our Data Protection Team (Director):

- **Data Protection Officer / Director:** Nicola Hirst, Director
- **Email:** nicola@emerald-green.uk
- **Address:** 203 Old Bank Road, Dewsbury, WF12 7AB

Complaints to the Regulator

You also have the right to make a complaint at any time to the UK's supervisory authority for data protection issues:

Information Commissioner's Office (ICO)

- **Website:** www.ico.org.uk
- **Helpline:** 0303 123 1113
- **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF