



Rocksteady Music School
Job Applicant Privacy Notice
Last Updated: 08/03/2024



Document Control

OWNER	Operations Director
APPROVER	CEO
CLASSIFICATION	Public
DATE OF ISSUE	08/03/2024
ISSUE	V1.0
REASON FOR ISSUE/UPDATE	First version
NEXT REVIEW	March 2025
DISTRIBUTION	All Rocksteady Job Applicants

VERSION	AUTHOR	SUMMARY OF CHANGES	DATE
0.1	Evalian Limited	First Draft	22/06/2023
0.2	Evalian Limited	Updated retention periods, updated international transfers	31/01/2024
1.0	Evalian Limited	Update to section 3	08/03/2024

Document Release:

This document remains the property of Rocksteady Music School. Release to regulatory authorities is permitted as required. Release to other organisations or individuals may only be authorised by Rocksteady Directors.

1. Introduction

Rocksteady Music School (“Rocksteady”, “us”, “we”, “our”) are committed to protecting your privacy and meeting our legal obligations when you apply for a job or you (or an agent acting on your behalf) share your employment details with us.

This privacy notice explains what personal data we collect and use relating to employment and associate candidates (“you”, “your”) during the recruitment process.

As an information-led business, we place great importance on ensuring the quality, confidentiality, integrity, and availability of the data we hold, and in meeting our data protection obligations where we process personal data. We are committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the effective date at the top of this document.

2. What personal data do we process?

Personal data means any information about an individual from which that person can be identified, therefore does not include data where the identity of the person has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection. Rocksteady is the data controller of the personal data we hold about you, registered as such with the Information Commissioner’s Office (“ICO”).

When you apply for a position (whether as an employee or consultant) or submit your CV (or similar employment information) to us, whether directly or through an agency, or attend an interview in person or by remote means, we will collect your personal data. This includes (but is not limited to):

- Name and contact details (address, mobile phone number and email address)
- Your CV and/or application form
- Company details (where applicable)
- Date of birth and gender
- Work history and employment positions held
- Salary, other compensation, and benefits information
- Nationality / visa / work permit information (where applicable)

- Academic and professional qualifications, education, and skills
- Photographs you may submit with your application
- Demographic information
- Records we create during interviews or correspondence with you
- Results of pre-employment screening checks such as references or DBS checks (where applicable)
- Any other information you choose to give us

We may also collect special category data in accordance with the Equality Act 2010. We will only do this, for example, to make reasonable adjustments to enable all candidates to apply for vacancies, attend interviews and to commence employment. This is also necessary to ensure we meet our legal obligations when recruiting.

3. Purposes and bases for using your personal data

We will process your personal information for the following purposes and under the following lawful bases:

Purpose	Lawful Basis for Processing
To assess your suitability for the role	Processing is necessary for taking steps to enter into a contract with you or for the performance of our contract with you.
To make reasonable adjustments for you during the interview process and comply with our legal obligations under the Equality Act 2010	Processing is necessary for us to comply with our legal obligations. For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights.
To conduct pre-employment screening checks including checking your identity and your right to work in the UK	Processing is necessary for us to comply with our legal obligations. For special category data, the additional basis that we rely on relates to our obligations in the



	field of employment and the safeguarding of your fundamental rights.
To contact unsuccessful applicants about future suitable vacancies, retain your information on file to be considered for future positions and to ask you about your Rocksteady recruitment experience.	We will carry out this processing where you have consented to us retaining your data and contacting you about future vacancies based on the skills set out in the records we hold about you.

4. Sensitive personal data

We will only process sensitive ‘special category’ personal data where we meet one of the conditions required by law for doing so. This includes complying with legal obligations or exercising specific rights in the field of employment law. We may also ask for your explicit consent to process some special categories of personal data.

We process special categories of personal data when we collect or process information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work and to provide appropriate workplace adjustments.

5. Sharing of your information

We may share your data with service providers and suppliers to our business who process data on our behalf. In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the contract between Rocksteady and the service providers and suppliers.

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies, regulatory bodies, or public authorities in order to prevent or detect crime. We will only ever disclose your personal data to these third parties to the extent we are required to do so by law.

Your Personal Data may be processed outside of the UK. Where this is the case, we have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:



- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or
- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. Within Rocksteady, your personal data will only be shared with those who need to have access to it, which will primarily be our HR personnel and hiring managers.

6. How long will we retain your information?

We will retain your personal data for only as long as is necessary for the recruitment process. If your candidacy is successful and you are employed or hired by us, your data will be processed and retained as set out in our employee privacy notice, provided to you with your employment paperwork.

If your application is not successful, with your consent we will retain your CV, application details and interview notes in order to inform you about any future vacancies we have that may be of interest to you. This consent can be withdrawn at any time and your application deleted, just contact us using the details in section 8.

We will also retain personal data where it is necessary to comply with our legal obligations or as necessary in relation to legal claims. This is rare but may mean we need to retain your data for longer than 2 years.

7. Your rights

Individuals whose personal data we process have the following rights:

- You have the right of access to your personal data and can request copies of it and information about our processing of it
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it
- Where we are using your personal data with your consent, you can withdraw your consent at any time
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way
- In some circumstances, you can restrict our processing of your data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data

If you wish to exercise any of your rights, please contact us at data@rocksteadymusicschool.com or write to us at the following address: Rocksteady Music School, Bohunt Manor, Portsmouth Road, Liphook, Hampshire, GU30 7DL.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, 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.

In addition to the above, please note that you have the right to make a complaint at any time to the ICO if you are concerned about the way in which we are handling your personal data.

8. Contact

You can contact Rocksteady in relation to data protection and this privacy notice by emailing data@rocksteadymusicschool.com.

Changes to this Notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Version: 1.0

Last modified 08/03/2024

You can contact us for previous versions of this Privacy Notice.