



## **Crimmins Hotels and Leisure Ltd Job Applicant Privacy Notice**

### **1 What does this Privacy Notice do and how does it apply to me?**

- 1.1 The purpose of this Privacy Notice is to inform you why and how Crimmins Hotels and Leisure Ltd (“we”, or “us”) handles personal information about you as a job applicant. This Privacy Notice will apply to you if you are a job applicant who has applied for any role within Crimmins Hotels and Leisure Ltd.
- 1.2 Nothing in this Privacy Notice creates any new relationship between you and us. Nothing in this Privacy Notice affects any right you have under any applicable law, including Regulation (EU) 2016/679 (the General Data Protection Regulation, or “GDPR”) and any other data protection law that applies to you.

### **2 Who is responsible for the proper handling of my personal information?**

- 2.1 Crimmins Hotels and Leisure Ltd is legally responsible for the proper handling of your personal information.

### **3 What sort of personal information about me does Crimmins Hotels and Leisure Ltd collect?**

- 3.1 The types of personal information about you which we collect in connection with our recruitment process will vary depending on various factors, including your personal circumstances, the progress you make in the recruitment process, and it can include any combination of the following types of personal information about you:
  - (a) your contact details such as title, name, home address, personal email address, and personal phone number;
  - (b) information about your skills, experience, and qualifications, including academic history and employment history, and any other information you include in your CV or otherwise provide to us in connection with your job application;
  - (c) information about your personality, character, temperament, and demeanour;
  - (d) information about the expectations you have in respect of the position you applied for, such as the type of employment sought, type of work you wish to perform, and your desired salary level;
  - (e) information about your personal circumstances, such as your availability for interviews, your notice period, your reasons for applying to Crimmins Hotels and Leisure Ltd, and

any adjustment you require in attending interviews or taking up a position within Crimmins Hotels and Leisure Ltd;

- (f) technical information such as the IP address from which you access our website, the type and version of browser you use to access our website, type of device you use to access our website, and so on (to the extent you apply to us through our careers section of the website); and
- (g) information about you which we are obliged to check or monitor for legal or regulatory reasons, such as information relating to your identity, nationality, visa/work permit, gender, disability, criminal record, (to the extent permitted by law)].

3.2 We will collect your personal information only where we are legally permitted to do so, and only to the extent it is appropriate and necessary for one or more of the purposes described in Section 4 below.

#### **4 Why does Crimmins Hotels and Leisure Limited collect my personal information and what are the legal justifications?**

4.1 We handle your personal information for the following purposes:

- (a) HR Administration. To ensure that we effectively manage and administer all aspects of our recruitment process, and to ensure the fairness in our recruitment process;
- (b) Business Administration. To facilitate our day-to-day business operation in general, including in relation to matters such as business planning and budgeting;
- (c) Corporate Governance. To manage our risks and safeguard the assets, reputations, and other rights and interests of Crimmins Hotels and Leisure Ltd as well as that of our workforce, clients, and other stakeholders; and
- (d) Legal and Regulatory Compliance. To ensure our compliance with all relevant legal, regulatory and contractual requirements, including the following:
  - (i) requirements that apply to us in our capacity as an employer, including those that relate to immigration, equal opportunity, anti-discrimination practices, health and safety at work, and integration of workers with disability or illness;
  - (ii) requirements which are imposed or enforced by other public authorities, such as tax authorities, garda/police and other law enforcement bodies, and courts and tribunals; and
  - (iii) any other legal duty which we owe to our workforce, clients, and other stakeholders, whether such duty is founded in statute, contract, or tort.

4.2 As part of the aforementioned purposes, we may, depending on the role you have applied for and to the extent this is permitted by law, use your personal information to perform the following:

- (a) background checks (including by verifying your academic/professional credentials, employment history, credit history, and any criminal record you may have). We may conduct cursory background checks at any point during your application process, but

we will conduct thorough background checks only if you are successful in your application, after you have accepted our offer; and

- (b) statistical analysis to inform our decision making, for example by measuring and benchmarking skills, experience, academic and professional qualifications, and salary expectations of our job applicants.

4.3 Where we handle personal information of a sensitive nature (such as information concerning your health or disability, or any criminal record you may have), we will do so only where this is strictly necessary and legally permitted, for example to monitor our compliance with laws concerning equal opportunity and anti-discrimination practices, or to discharge our regulatory obligation to ensure the fitness and probity of individuals we employ in certain roles.

4.4 In handling your personal information for the aforementioned purposes, we rely on the following legal justifications:

- (a) Contractual Necessity: we rely on it where we handle your personal information in order to evaluate your job application and make you an offer if you are successful; this is the case where we handle your personal information for the purpose of HR Administration;
- (b) Legitimate Business Interest: we rely on it where we need to handle your personal information in order to operate, manage, and develop our business (provided that we can strike the right balance between our interests and your interests);
- (c) Legal and Regulatory Requirement: we rely on it where we handle your personal information for the purpose of Legal and Regulatory Compliance; and
- (d) Consent: we rely on it where we handle your personal information based exclusively on your permission.

## **5 How does Crimmins Hotels and Leisure Ltd obtain my personal information?**

5.1 We obtain much of your personal information directly from you, but depending on your circumstances, we may obtain your personal information indirectly from a range of sources.

5.2 Sources from which we might obtain your personal information include, without limitation, the following:

- (a) those who have put you forward as a candidate (e.g. recruitment agency or temporary staffing agency);
- (b) those who provide references for you (e.g. academic institutions you have attended or your former employer);
- (c) websites where you have voluntarily made your personal information publicly accessible (non-exhaustive examples of such websites include Jobbio, Facebook, LinkedIn, Tumblr, Twitter, and Xing);
- (d) publicly accessible registers and databases, such as databases of journals and news articles; and

- (e) providers of background check and business risk screening services, including credit reference agencies and operators of criminal records database.

## **6 Do I have to allow Crimmins Hotels and Leisure Ltd to collect my personal information?**

- 6.1 Where we handle your personal information by relying on the legal justification of Contractual Necessity or Legal and Regulatory Requirement, we will in most cases have to insist that you provide us with the personal information that we request in order to process your application.
- 6.2 In such cases, if you refuse to provide your personal information when requested by us, your refusal can adversely affect our ability to assess your job application and in an extreme case, we may have to reject your job application (as allowable by law).
- 6.3 In all other cases, it is not mandatory for you to provide any personal information which we ask you to provide or for you to agree to us handling your personal information in any particular way. Nevertheless, where we are legally permitted to do so, we reserve the right to handle your personal information, if and to the extent this is appropriate and necessary for any of the purposes described in Section 4 above.
- 6.4 For the avoidance of doubt, where we handle your personal information by relying on consent as the legal justification, you can revoke your consent at any time you wish without worrying about the consequences of your choice.

## **7 Does Crimmins Hotel and Leisure Limited share my personal information with others?**

- 7.1 We will share your personal information with others only if and to the extent this is appropriate and necessary for one or more of the purposes outlined in Section 4 above. Recipients who might receive your personal information from us will vary depending on your circumstances, but broadly speaking, the potential recipients can be grouped into the following categories:
  - (a) recruitment agency, temporary staffing agency, and other like third parties who put you forward as a candidate;
  - (b) academic institutions you have attended, your former employer, and other like third parties we contact in order to obtain your reference and to validate your academic history and employment history;
  - (c) companies, that belong to Crimmins Hotels and Leisure Ltd, including those who influence or determine the overall direction of the business as well as those who perform any of the support roles described in paragraph (d) below;
  - (d) those who support our business operation and HR Administration (e.g. data centre operators, IT service providers, providers of background check and business risk screening services, etc.); and
  - (e) government departments and agencies, police, regulators, courts, tribunals, and other like authorities with whom we are legally obliged to share your personal information.
  - (f) Hotel management company

**8 Does Crimmins Hotels and Leisure Ltd transfer my personal information outside Europe?**

8.1 We do not transfer your personal data outside the European Economic Area (EEA).

**9 Will my personal information be kept secure by Crimmins Hotels and Leisure Ltd?**

9.1 We take information security very seriously and we use a broad range of tools and techniques to prevent and detect incidents that might adversely affect our information, such as unauthorised access or disclosure, and accidental change or loss.

9.2 The tools and techniques we use include technical measures such as firewalls, backup and disaster recovery systems, antimalware, and encryption, as well as other measures such as vetting of suppliers who are entrusted with our information, awareness training for our workforce, and the continuous evaluation and enhancement of our information security controls.

**10 How long will Crimmins Hotels and Leisure Ltd retain my personal information?**

10.1 If you are successful in your job application and you accept the offer we make, your personal information will be incorporated into and retained as part of records kept by our HR department.

10.2 If you are unsuccessful in your job application, then unless you object, we will retain your personal information typically for up to 18 months (as allowable by law) so that we may contact you in case we identify an alternative career opportunity at Crimmins Hotels and Leisure Ltd which we consider to be suitable for you.

10.3 Where we identify a need to retain your personal information for any other reason (e.g. to defend ourselves from any legal claim or dispute that arises in connection with your job application), we reserve the right to retain your personal information for a longer period, for as long as we are legally permitted to do so.

**11 What rights do I have in respect of my personal information?**

11.1 Under GDPR, you have certain legal rights in respect of your personal information handled by us. These include the following:

- (a) the right to ask us to confirm whether or not we handle any personal information about you;
- (b) the right to ask us to provide you with copies of your personal information we hold;
- (c) the right to ask us to provide you with a soft copy of personal information you provided to us (or to forward them to any other person you specify);
- (d) the right to ask us to correct any inaccuracy or incompleteness in your personal information we hold;
- (e) the right to ask us to delete your personal information we hold;
- (f) the right to ask us to refrain from handling your personal information where you feel that the handling of your personal information by us is unwarranted, for example due to inaccuracies in your personal information or lack of proper legal justification; and

- (g) the right to object to how we handle your personal information, for example by asking us not to use your personal information to profile you or to subject you to automated decision-making.

11.2 Additionally, where we use your personal information by relying on your consent, you have the right to withdraw your consent at any time, but please note that if you revoke a consent you have previously given, we won't always be able to undo what we have done by relying on your consent.

## **12 Who can I contact about my personal information?**

12.1 If you would like to exercise any of the rights you have in respect of your personal information, or if you have any question or concern regarding the way in which we handle your personal information, then in the first instance please contact the person from our HR department you have been liaising with.

12.2 If you have a complaint regarding the way in which we handle your personal information, please contact [compliance@tifcohotels.ie](mailto:compliance@tifcohotels.ie) .

12.3 We will endeavour to respond satisfactorily to any request, query, or complaint you may have in respect of your personal information, but if you are dissatisfied with our response and wish to make a formal complaint, or if you simply wish to learn more about your rights, you can contact the Data Protection Commission, Canal House, Station Road, Portarlington, Co. Laois, R32 AP23, Ireland <https://dataprotection.ie>