Candidate Privacy Notice

Data controller:	The Gym Group PLC, 08528493
Data Protection Officer:	Georgina Chambers, Data Protection Manager
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As part of any recruitment process, the Gym Group collects and processes personal data relating to all job applicants. We are committed to being transparent about how we collect and use your personal data and to meeting our data protection obligations in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018 (as amended from time to time ("the Data Protection Legislation").

WHAT INFORMATION DOES THE GYM GROUP COLLECT ON ME?

The organisation collects a range of information about you:

- Personal details such as your name, address and contact details; including email address and telephone number
- Your date of birth (where voluntarily disclosed for equal opportunities monitoring purposes)
- Work history and job data, such as previous employment; the positions and dates, your professional qualifications, skills and experience
- Compensation information such as your current level of remuneration and benefit entitlements
- Information about your entitlement to work in the UK and identity
- Recruitment results, such as interview and assessment notes
- Photographs and images from on-site Gym CCTV to comply with health and safety laws; to detect and prevent crime and to monitor your compliance with applicable Gym rules

We may also collect and process a range of 'special categories' of data:

- Information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments
- Equal opportunities monitoring information, including information about your ethnic origin, nationality, sexual orientation and gender identity.

Because we collect and process special categories of personal data, we have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

We collect this information in a variety of ways but generally this information will be collected directly from you through the personal information and documentation you provide as part of the application process such as your CV and the additional data you enter into our applicant management system Workday. Furthermore, we learn information about you through your interactions with us through the selection process such as interviews and other assessments.

We will also collect personal data about you from third parties, such as where you have applied for a role via a recruitment agency or a current employee has recommended you or if you have made this information publicly available through a job board or other network/ database. Data will be stored in a range of different places, including on our HR applicant management system, Workday and other IT systems such as email.

HOW DOES THE GYM GROUP COLLECT MY PERSONAL DATA?

Our ability and entitlement to process your personal information is governed by a number of processing conditions set out in the Data Protection Legislation. This means that we may rely on more than one of these conditions in order to process elements of your personal data throughout the recruitment process. Generally, the Gym Group will process your personal data relying on the following legal grounds:

- It is in our legitimate interest, as a provider of gyms, to process your personal information in order to:

    - o Administer your application in order to manage the recruitment process
    - o make selection decisions and keep appropriate records.
    - o to respond to and defend against legal claims
    - o to operate and manage a successful health and fitness business

- We need to process your data to ensure we comply with our legal obligations; for example, to check that you are eligible to work in the UK.
- At your request in order to enter into an employment contract with you

During the course of your application it may also be necessary for the Gym Group or our suppliers to process special categories of information about you where we have obtained your explicit consent or where is permitted by applicable laws. For example, we may need to process health information in order to make reasonable adjustments to the recruitment process if a job applicant has a disability in order to comply with our duties under the Equality Act 2010 and applicable health and safety laws or where it is necessary to protect your vital interests.

Where the reason for processing your data is a legitimate interest, we have considered whether or not those interests are overridden by the rights and freedoms of job applicants, employees or workers and have concluded that they are not. We will not use your data for any purpose other than the recruitment exercise for which you have applied.

WHO HAS ACCESS TO MY PERSONAL DATA?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the People team who have responsibility for recruitment processes, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff, if access to the data is necessary for the performance of their roles.

With the exception of instances where third party suppliers are managing an aspect of the recruitment and selection process on our behalf, we will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers or other organisations or individuals as applicable to obtain references for you.

We will not transfer your data outside the European Economic Area.

HOW DOES THE GYM GROUP PROTECT MY DATA?

The Gym Group takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

FOR HOW LONG DOES THE GYM GROUP KEEP MY DATA?

If your application for employment is unsuccessful, we will hold your data on file for 12 months following completion of the relevant recruitment process. At the end of that period we will delete or otherwise securely destroy your data.

If your application for employment is successful, your personal data that was gathered during the recruitment process will be transferred to your personnel file and retained during your employment.
The periods for which your data will be held will be provided to you in a new employee privacy notice.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We also take into account the limitation periods applicable for making any claims against us.

WHAT ARE MY RIGHTS AS A DATA SUBJECT?

You have a number of rights, you can:

- Access and obtain a copy of your data on request
- Require the organisation to change incorrect or incomplete data
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Withdraw your consent to the processing of your data where there is no other lawful basis to continue to do so
- Object to the processing of your 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 your interests override the organisation's legitimate grounds for processing data.
- Data Portability

If you have created a Workday account during your job application, you will be able to view your personal data and amend your contact email address. For all other changes or if you would like to exercise any of your other rights as data subject, please contact the Data Protection Team by email dataprotection@thegymgroup.com. If you believe that the Gym Group has not complied with your data protection rights, you can complain to the Information Commissioner.

WHAT IF I DO NOT WANT TO PROVIDE THE GYM GROUP WITH ME PERSONAL DATA?

You are under no statutory or contractual obligation to provide your data to The Gym Group during the recruitment process. However, if you do not provide the information, we may not

be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK, any job-related qualifications and satisfactory references.

AUTOMATED DECISION-MAKING

We do not generally make recruitment or hiring decisions solely on automated decision making. In the event that the Gym Group does rely solely on automated decision making that could have a significant impact on you, we will provide you with an opportunity to express your views and will provide any other safeguards required by law.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update or amend this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates/amendments. We may also notify you in other ways from time to time about the processing of your personal data.