

### **Introduction**

Highland and Islands Airports Limited (HIAL) is a public corporation wholly owned by the Scottish Ministers. The company operates and manages 11 Airports at Barra, Benbecula, Campbeltown, Dundee, Islay, Inverness, Kirkwall, Stornoway, Sumburgh, Tiree and Wick. HIAL's airports are vital to the social and economic welfare of the areas they serve, but are loss making, and are supported by subsidies from the Scottish Government in accordance with Section 34 of the Civil Aviation Act 1982.

HIAL uses personal information for a range of purposes and our privacy notices provide information about why we obtain and collect personal information, and how we process it.

This privacy notice provides information about how we use personal information you provide through our recruitment portal, which is provided by eArcu on HIAL's behalf.

### **Why are we collecting your information?**

The primary purpose of the recruitment portal is to allow people to receive information about posts that are available within the HIA group of companies (which includes AMSL and DAL as well as HIAL), and to enable people to create and submit a job application where they wish to be considered for one of the positions available.

### **What information is collected?**

The information we collect from you will depend upon how you wish to use the portal. To sign up to job alerts, you create a profile for which we require:

- Your e-mail
- Your alert preferences

You may choose to use to register a profile linked to your Facebook or LinkedIn account. In this case eArcu will:

- Use your Facebook or LinkedIn profile, including your experience, education, skills and recommendations
- Use the primary e-mail address associated with your Facebook or LinkedIn account. eArcu's terms will apply. These can be modified at any times from your profile settings.

To apply for a position with the HIA group of companies, we will collect information about:

- Contact details

- Skills, qualifications, experience and work history
- Eligibility to work in the UK
- Personal circumstances where relevant, for example, to assess requirements for relocation
- Criminal convictions – this is required due to the requirement to assess eligibility for a security pass
- Medical information for some roles
- Driving license status for some roles
- Conflicts of interest
- Any previous employment with the HIAL group
- Information to allow us to monitor our compliance with equalities legislation

Most posts will also require us to obtain a security pass for you and you are likely to require a Disclosure Scotland certificate. Some roles also require a Counter Terrorist Check.

The HIAL Group will use Internet searches on Social Media sites to perform due diligence on candidates in the course of recruitment for some roles. Where we do this, we will act in accordance with our data protection and equal opportunities obligations. Such searches will only be undertaken by the HR team. HR and vacancy managers will also review candidate profiles on professional social networking sites, such as LinkedIn, as part of the recruitment process where it is appropriate to do so for the role being applied for. If you have any queries regarding whether your internet profile will be viewed as part of the application process please contact [recruitment@hial.co.uk](mailto:recruitment@hial.co.uk).

It should be noted that the information requirements may vary accordingly to role and if you have any queries about information we are asking you for, please contact [recruitment@hial.co.uk](mailto:recruitment@hial.co.uk) in the first instance.

### **How will my information be used?**

#### *Lawful Basis*

Where you have requested that job alerts are e-mailed to you, we are processing this request based on your consent. You will be e-mailed an alert each time a relevant new vacancy is added to the portal. You may withdraw this consent at any time.

Information relating to a specific job application is processed for the purposes of taking the necessary steps to enter into a contract of employment. For successful candidates, HIAL will retain this information on your personnel file to manage this contract. All data for employees will be processed in line with Company Policies. Policies are available to all staff via the Intranet, or by request to all.

For unsuccessful candidates, a limited amount of information about your application is retained for a short time after the decision-making process is complete to ensure we are able

to deal with any queries relating to your application. Further information on retention timescales is provided below. This is in the legitimate interests of HIAL to ensure it is able to provide feedback to candidates and manage any enquiries or correspondence arising from the recruitment process.

Within the recruitment portal, you also have the option to upload and store your personal information that may be saved and used for a job application at some point in the future. We are processing this information using your consent which you may withdraw at any time. You can request this information be deleted at any time by contacting [recruitment@hial.co.uk](mailto:recruitment@hial.co.uk).

### *International Transfer*

HIAL has data processing agreements in place with those that process personal information on our behalf, including eArcu. As far as we are able to establish, your personal information will not be transferred to any countries that are outside of the EEA.

### **Will my information be passed to anyone else?**

Where you have signed up for job alerts, your data will be processed by IT companies processing personal information on HIAL's behalf, and will not be passed to any other third parties.

Any information submitted in response to a job application will be passed to the recruitment panel members, with the exception of any information relating to equalities. Equalities information is processed by the HR team only. Information may be sent to other third parties where it is required as part of the recruitment process. This includes Disclosure Scotland and, depending upon the role you are applying for, may include passing information to HIAL's Occupational Health provider or GP surgery providing this service on HIAL's behalf.

Personal information that is uploaded to the portal although not submitted as part of a job application is not processed by any team within HIAL or any third party, other than the recruitment portal which provides the storage facility.

HIAL has a contracted service for the provision of a Data Protection Officer and your information may be processed in the course of providing that service, for example for the purposes of auditing data protection compliance.

### **What happens when my information is no longer required?**

HIAL regularly verifies that those who have signed up for job alerts wish to continue to receive them. If you do not respond to a request to confirm you wish to continue to receive job alerts, you will be removed from the list 3 months after our confirmation request. You may withdraw your consent at any time by contacting [recruitment@hial.co.uk](mailto:recruitment@hial.co.uk) and you will be removed from HIAL's job alerts with immediate effect. You can also unsubscribe from these alerts using the

link provided in each e-mail or by logging into the portal. If you wish for your details to be deleted this can be done by e-mailing [recruitment@hial.co.uk](mailto:recruitment@hial.co.uk).

Personal information submitted as part of a job application will be retained as follows:

- For successful candidates who enter into a contract of employment, 6 years from the date of termination of employment;
- For successful candidates who chose not to enter into a contract of employment and unsuccessful candidates, information is retained for 690 days, as detailed below.
- Personal information that has been uploaded to the portal and has not been used as part of a job application will automatically be archived after 600 days if it is not reviewed and updated and deleted automatically after a further 90 days. You can delete this information at any time using the portal.

### **Additional rights**

Under the GDPR, you have a number of rights in relation to your personal information. You have the right to:

- i. request access to your personal information;
- ii. request rectification of your personal information which means you are able to have inaccurate personal information corrected without undue delay;
- ii. request erasure of your personal information when certain conditions apply;
- iii. restrict processing under certain circumstances;
- iv. object to processing;
- v. data portability in some circumstances.

Requests that relate to rectification, erasure or restricting processing will be passed to any recipients of your personal information. Details of recipients can be found under the section [Will my information be passed to anyone else?](#)

There may be occasions when HIAL is unable to comply with requests to exercise the rights above. Should this apply to a request you make, it will be explained to you why HIAL is unable to comply with the request and any options available.

Where your personal information is being processed using consent, one further right is the right to withdraw your consent at any time. You should be aware that, while HIAL will stop using your information for that purpose with immediate effect, it may not always be possible to remove information from the public domain, for example where it has been used in hard copy publications. You can find out how your personal information is being lawfully processed under the section [How will my information be used?](#)

You may withdraw your consent at any time for allowing your information to be used for marketing purposes, which includes your information being processed for the purposes of receiving job alerts.

## **Complaints**

Should you be unhappy with the way in which HIAL have processed your personal data, you have the right to lodge a complaint with the Information Commissioner, who regulates data protection legislation across the UK. Their contact details can be found at <https://ico.org.uk/>.

## **Contact details**

HIAL's Data Protection Officer is Liz Taylor. Her e-mail address is [ltaylor@hial.co.uk](mailto:ltaylor@hial.co.uk). For matters relating to the recruitment process, please contact [recruitment@hial.co.uk](mailto:recruitment@hial.co.uk).