



Recruitment privacy notice

Introduction

This privacy notice is issued on behalf of World Federation of Advertisers (referred to in this policy as “the Company”, “WFA”, “we”, “us” or “our” in this privacy notice). We are responsible for processing your personal data in accordance with data protection laws.

The Company is committed to protecting the privacy and security of your data and to processing your data securely and transparently. We need to gather and use information or ‘data’ about you (“job applicant”) as part of our business and to manage our working relationship with you. We intend to comply with our legal obligations under the EU General Data Protection Regulation (‘GDPR’) and applicable the national data protection laws in respect of data privacy and security. We have a duty to notify you of the information contained in this privacy notice.

This notice applies to job applicants and sets out how we handle your personal data as a ‘data subject’ when you apply for a job (which for the purposes of this privacy notice includes all types of jobs, such as part-time, full-time or remote-working jobs).

WFA is a “data controller”. This means that we are responsible for deciding how we process and store your data. This notice explains to you what decisions we have taken in relation to that information.

Our contact details are as follows:

World Federation of Advertisers
140 Avenue Louise, 1050 Brussels, Belgium
Telephone: +32 2 502 57 40
Email: privacy@wfanet.org

Purpose of the Document

This privacy notice sets out, in line with current data protection obligations, the types of data that we collect and retain about you as a job applicant of the Company.

This privacy notice describes why and how we collect and use personal information about you during the recruitment process, with whom we might share it and how long we usually keep it.

It is important that you read and understand this notice so that you are aware of how and why we are processing such information and what your rights are under applicable data protection legislation.

Data protection principles

We will comply with data protection law. In relation to your personal data, we will:

- process it lawfully, fairly and in a transparent way.
- request data that is absolutely required for that purpose, this means that no other data than what is necessary will be requested.
- limit the processing of your data to the legitimate purpose for which that personal data was originally collected from you.
- ensure it is accurate and, where necessary, kept up to date.
- keep the data for no longer than is necessary for the purposes for which the personal data are processed.
- process it in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

The kind of personal data what we process about you

‘Personal data’ means information which relates to a living person who can be identified from that data (a ‘data subject’) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and



an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

We will collect, store, and use the following categories of personal information about you:

- Basic personal details (e.g. full name, title, date of birth).
- Contact details (e.g. telephone number, email address, residential address).
- Recruitment information (e.g. CV, professional membership, application form, references supplied by your former employer).
- Employment records (work history, previous remuneration package, benefits, job titles, work history and reason for leaving).
- Results from any tests or personality profile questionnaires.
- Any information you provide to us during an interview, including face to face and telephone interviews and associated emails.
- Documentation related to immigration, right-to-work and residence status, such as a passport or identity card.
- If you contact us regarding your application, a record of that correspondence.
- The status of your application and updates on how it moves forward.
- Other information required for some applications.
- Medical information, if necessary, to comply with applicable laws, or in order to provide medical care to you.
- Whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process.
- Any other category of personal data which we may notify you of from time to time.

Special category personal data

We may also collect, store, and use the following “special categories” of more sensitive personal information which will be collected and used only if and to extent a local legislation requires.

Special categories of data are data relating to your:

- health, including any medical condition, health and sickness records, and disability
- gender
- sexual orientation
- race
- ethnic origin
- political opinions
- religious/philosophical beliefs
- trade union membership
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations or exercise rights in connection with employment
- we must process data for reasons of substantial public interest
- you have already made the data public.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

We will use your special category data:



- for compliance with equal opportunity or anti-discrimination legislation or regulations
- to determine reasonable workplace adjustments
- to ensure health and safety in the workplace.

Do we need your consent?

We do not need your consent if we use personal data, including special categories of personal data, in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be provided with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time.

How we collect your personal data

We collect personal information about you through the application and recruitment process, either directly from you as a job applicant or collected through interviews or other methods of assessment, or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, publicly accessible sources, credit reference agencies or other background check agencies.

Personal data is kept in personnel files or within the Company's HR and IT systems.

Why we process your personal data

The laws on data protection allows us to process your personal data for certain reasons only:

1. **Contractual obligations:** the processing is necessary for a contract we have entered into with you, or because you have asked us, or we need to take specific steps before entering into a contract.
2. **Legal obligations:** the processing is necessary for us to comply with a legal obligation.
3. **Legitimate interest:** the processing is necessary for our legitimate interests, or the legitimate interests of a third party and your interests and fundamental rights do not override those interests.
4. **Consent:** you have given clear consent for us to process your personal data for a specific purpose.

We may also use your personal data in the following situations, which are likely to be rare:

5. **Vital interests:** the processing is necessary to protect your interests (or someone else's interests).
6. **Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data. For example, we need to collect your personal data in order to:

- assess your skills, qualifications, and suitability for the role.
- to take steps prior to entering into a contract with you
- to process your data to enter into a contract with you.

We also need to collect your data to ensure we are complying with legal or regulatory requirements such as:

- carrying out checks in relation to your right to work and
- making reasonable adjustments during the recruitment process should it be required to.

Situations in which we will use your personal data



We need all the categories of information in the list above primarily to allow us to enter into a contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment with us.
- Checking you are legally entitled to work in the country in which the job is based.
- Moving your job application forward.
- Checking that you're the right candidate for the role.
- Getting in contact with you.
- Sending you notifications for vacancy roles or job alerts.
- Determining the terms on which you will work for us.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Complying with health and safety obligations.
- Equal opportunities monitoring.
- Keeping records related to our hiring processes.
- Complying with internal policies, accountability and governance requirements and company investigations.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Fraud detection and prevention (crime prevention).
- Defending claims - sharing CCTV images from premises with insurers when required for processing, investigating or defending claims due to incidents that have occurred on Company premises.
- Complying with foreign law, law enforcement, court and regulatory bodies' requirements.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you do not provide your personal data to us

You are under no statutory or contractual obligation to provide data to the Company 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.

Sharing your personal data

Personal information you provide in the recruitment process will be made available to the Company and some third-party organisations acting as data processors (such as our third-party software providers). If you are successfully recruited, we will upload your details to our HR system. If offered employment with the Company, you will sign a contract of employment and agree to additional terms on how your data is handled and stored.

We may have to share your data with third parties, including third-party service providers and other entities in the group. We will share your personal information with third parties where required by law, where it is necessary to complete the recruitment process with you or where we have another legitimate interest in doing so.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.



Where we use third party service providers based outside of the EU (e.g. with servers located outside of the EU), we take steps to ensure the relevant countries provide an adequate level of protection for your personal information. We have data protection provisions in our agreements with such third parties, or data processing agreements in place with all such third parties which provide protection to our business in respect of data held by those parties.

Data Security

Protecting your data

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies and in line with current data protection requirements. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

Data Retention

How long we keep your personal data for

If your application for employment is unsuccessful (including when you have speculatively applied to us in respect of a role which is not available), we will hold your data on file for 12 months. At the end of that period, your data is deleted or destroyed (unless we need to retain it for longer to exercise or defend any legal claims).

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

Information about criminal convictions

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Automated decision making

Recruitment processes are not based solely on automated decision-making.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Your rights in relation to your personal data

Under certain circumstances, the law grants you specific rights. These are summarised below. Please note that your rights may be limited and subject to restrictions in certain situations:

- **the right to be informed.** This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- **the right to rectification.** If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it.
- **the right to erasure.** You have the right to ask us to erase your personal information in certain circumstances.
- **the right to restrict processing.** You have the right to ask us to restrict the processing of your information in certain circumstances.



- **the right to data portability.** This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you.
- **the right to object to processing.** You have the right to object to the way we use your data where we are using it for our legitimate interests.
- **the right to regulate any automated decision-making and profiling of personal data.** You have a right not to be subject to automated decision making in way that adversely affects your legal rights.
- **the right of access.** You have the right to ask us for copies of your personal information. To do so, you should make a subject access request. You can read more about this in our data subject access request policy which is available from HR.

If you wish to exercise any of the rights explained above, please email privacy@wfanet.org

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Making a complaint

We are committed to safeguarding your data and upholding your rights, but if you feel we have not done that, please contact us via email at: privacy@wfanet.org

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will inform you and provide an updated copy of this notice by email. We may also notify you in other ways from time to time about the processing of your personal information.