

PRIVACY NOTICE

GATSBY AFRICA

JOB APPLICANTS

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INTRODUCTION

Gatsby Africa (“GA/we/us/our”) is funded and supported by The Gatsby Charitable Foundation, one of a number of different independent, grant-making trusts established by members of five generations of the Sainsbury family. We share offices located at The Peak, 5 Wilton Road, London SW1V 1AP with other trusts that comprise the Sainsbury Family Charitable Trusts (SFCT).

Our overall objective is to create jobs and improve incomes for poor people in East Africa (primarily in Kenya and Tanzania) and we achieve this through sector development programmes.

GA provides funding support and is a trustee of a Tanzanian trust called The Forestry Development Trust. We also provide funding support and are a member in two Kenyan organisations: Msingi and Kenya Markets Trust (KMT).

Keeping your personal information safe is very important to us. GA is registered as a data controller with the Information Commissioner’s Office (registration number ZB049111) and is also registered with Companies House (registration number 09360833) and with the Charity Commission for England and Wales (charity number 1168223). We are committed to the protection of your personal data we process in line with the data protection laws applicable to the UK, namely the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018.

We have a nominated member of SFCT staff who serves as our Data Protection Manager. If you have any questions regarding how we collect, store and process your personal data, please email dataprotection@sfct.org.uk.

This privacy notice explains what personal data we collect from individuals (“you/your”) who apply for a job or an internship at Gatsby Africa or one of our affiliates. The data controller is the organisation to which you have submitted your job application to.

We place great importance on ensuring the quality, confidentiality, integrity, and availability of the data we hold and in meeting our data protection obligations when processing personal data. GA is 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 or other grant services we offer. When changes are made, we will update the date at the bottom of this document. Please review this privacy notice periodically to check for updates.

WHAT PERSONAL INFORMATION WE PROCESS

When you apply for a role (whether as an employee or an intern) or submit your CV (or similar employment information) to us, whether directly or through an agency, or attend an interview, we will collect your personal data. This includes:

- Name and contact details (address, mobile phone number and email address),
- Date of birth and gender,
- Work history and employment positions held,
- Salary, other compensation and benefits information,
- Nationality / visa / work permit information,
- Academic and professional qualifications, education and skills,
- Driving licence (if any),
- Current notice period & salary expectations,
- Photographs or videos you submit with your application,
- Records we create during interviews or correspondence with you,
- Answers given to role specific qualification questions,
- Personal work references,
- Results of pre-employment screening / eligibility to work checks,
- Any other information you choose to give us,
- Images recorded using security CCTV, where installed whilst visiting our offices.

We collect special category data in accordance with the Equality Act 2010. We will only do this to make reasonable adjustments in the workplace 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. We may also collect data for diversity

monitoring as an important means of implementing and promoting diversity within the workplace.

PURPOSES & BASES FOR USING YOUR PERSONAL DATA

We may use your data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
Responding to correspondence from you.	It is in our legitimate interest to respond to you when you make an employment or general enquiry.
Processing your application to assess suitability for employment.	<p>When processing your personal data for the purposes of administering your job application or assessing your candidacy for a role, we do so with your consent.</p> <p>When processing your special category data, we do so with your explicit consent.</p>
Assessing suitability for employment.	<p>It is our legal obligation under the Equality Act 2010 to protect all applicants from discrimination in the workplace at all stages of pre-employment and employment.</p> <p>When processing your special category data, we do so with your explicit consent.</p>
Arranging and conducting recruitment interviews, either in person, via telephone or other means.	We rely on your consent to process your personal data in order to facilitate our recruitment process.
Obtaining necessary references from third parties and conducting pre-employment screening checks.	<p>We rely on your consent to process your personal data in order to facilitate our recruitment process.</p> <p>When processing your special category data, we do so with your explicit consent.</p>
Contacting unsuccessful applicants about future suitable vacancies.	It is our legitimate interest to archive applications, maintain the details of, and stay in contact with, suitable candidates for future roles.

Purpose	Lawful Bases for Processing
Sharing personal data with third parties including government agencies, law enforcement agencies and others.	<p>It is our legal obligation to cooperate fully as and when required by law.</p> <p>When processing your special category data, we do so with your explicit consent.</p>

SHARING OF YOUR INFORMATION

We may share your data with service providers and suppliers to our business who process data on our behalf including those in countries outside the UK where the data protection laws are not equivalent to those within the UK. We do so using Standard Contractual Clauses approved by the European Commission and recognised by the UK which contractually oblige our group companies in those countries to comply with the same data protection standards as legislated within the EEA. 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 us.

Within GA, your personal data will only be shared with those who need to have access to it. This will primarily be our HR personnel and hiring managers.

INTERNATIONAL TRANSFERS

GA provides centralised support services from our London office to our branch offices and affiliates in East Africa.

GA works with several advisors and suppliers and it is possible that we will share your data with other third-party suppliers that process your data in countries outside the UK where the data protection laws are not equivalent to those within the UK. Where this applies, we do so, either based on an 'adequacy decision' or using Standard Contractual Clauses approved by the European Commission and recognised by the UK which contractually oblige companies in those countries to meet the same standard expected within the EEA.

HOW DOES GA PROTECT PERSONAL DATA?

GA takes the security of your data seriously. We have internal policies and controls in place 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 we engage third parties to process personal data on our 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 the data.

HOW LONG WE KEEP YOUR DATA

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 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 candidacy is not successful, we will retain your CV, application details and interview notes for 12 months (from the date of first receipt of your details). During this time, we may add your information to our talent pool unless you ask us not to or subsequently object to us doing so.

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 12 months.

YOUR RIGHTS

Individuals whose personal data we hold, and 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 your rights, please contact us at dataprotection@sfct.org.uk or write to us at the address provided below.

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.

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 an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Please note that you have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data.

AUTOMATED DECISION MAKING

We do not make employment decisions based solely on automated decision making.

CONTACT

You can contact GA in relation to data protection and this privacy notice by writing to:

Data Protection Manager
Sainsbury Family Charitable Trusts
The Peak,
5 Wilton Road,
London SW1V 1AP

Or you can email us at dataprotection@sfct.org.uk

We have also appointed an independent Data Protection Officer at data protection consultants, Evalian Limited who can be contacted by email at dpo@evalian.co.uk.

Last updated: 8 June 2021