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Checked	-	Checked	-
Approved	-	Approved	-

Revision	Date	Author	Approved	Description of changes
1.0	-	-	-	-
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1.0 Recruitment privacy policy

Full Circle Holding BV and all its subsidiaries is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during the recruitment process, in accordance with the General Data Protection Regulation (GDPR) and Equal Employment Opportunity (EEO) regulation and applies to all candidates.

This Privacy Notice is for information only; it is not a contractual agreement.

1.1 To who does this policy apply

This Privacy Notice applies to individuals who access and use our recruitment platform, including through our website or mobile app.

2.0 What information do we collect?

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter/email;
- Any information you provide to us during an interview; and
- Information you provide in relation to your right to work documentation.


We may also collect, store and use the following special categories of more sensitive personal information, where relevant and lawful:

- Information about your criminal record; and
- Information about previous jobs and performance.

We collect this personal information from the following sources:

- You, the candidate;
- Recruitment agencies;
- Search consultants;
- Our employment background check, whether done by the company or through third parties
- Our credit reference agency;
- Your named referees and/ or referrals; and
- Data from third party publicly accessible sources. For example, SRA and CILEx professional memberships, LinkedIn, Github and others.

3.0 Why do we process personal data?

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We process your personal data for the following purposes:

- to take steps at your request prior to entering into a contract with you;
- to enter into and potentially perform a contract with you;
- to comply with our legal obligations (e.g., checking your right to work in the relevant country);
- to assess your skills, qualifications, and suitability for the role;
- to communicate with you about the recruitment process;
- to keep records related to our hiring processes; and
- to comply with legal or regulatory requirements.

We have a legitimate interest in processing personal data during the recruitment process to manage recruitment, assess and confirm suitability for employment, and decide to whom to offer a job. We may also need to process data to respond to and defend against legal claims.

We process health data to make reasonable adjustments during the recruitment process. This is only done with your consent or where legally required. We ask candidates not to provide medical information unless it is necessary for the recruitment process.

We may carry out criminal record checks to ensure candidates are suitable for the role, using trusted third-party providers and only where permitted by law and with your consent.


We will not use your data for any purpose other than recruitment.

4.0 Who has access to data?

Your data will be shared internally only as needed for recruitment purposes. This includes:

- HR and recruitment teams;
- Interviewers and hiring managers;
- IT staff (for system support purposes).
- We may also share your data externally with:
 - Third parties advising us during recruitment, such as assessment providers;
 - Former employers to obtain references (once you accept a job offer);
 - Background check providers and credit reference agencies.

All third-party service providers are required to take appropriate security measures to protect your data in line with our policies.

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We do not transfer your personal information outside the UK or European Economic Area (EEA). If this becomes necessary, we will inform you and ensure adequate safeguards are in place.

5.0 How do we protect data?

We have put in place technical and organisational security measures to prevent your personal information from being accidentally lost, used or accessed unlawfully, altered or disclosed. Access is limited to those with a business need who are subject to confidentiality obligations. We have procedures in place to deal with suspected data breaches and will notify you and the regulator where legally required.

6.0 For how long do we keep data?

If your application is unsuccessful, we will keep your data for 6 months after the end of the recruitment process. You will be notified one month before deletion, and you can choose to extend storage for another 6 months. If your application is successful, your data will be transferred to your personnel file and kept in line with our employee data retention policy, detailed in our employee privacy notice.

6.1 Your rights


As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact either a member of the HR team on the following email address recruitment@fullcirclewindservices.com

6.2 Consent

When applying, or being referred by an employee or agency, you will be asked to provide explicit consent to processing your data. Without this consent, we will not be able to process your application and your data will be deleted.

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7.0 Change/ deletion of personal data

You can update or delete your data at any time through our recruitment platform. Changes will take effect within 24 hours. Please note this may impact our ability to process your application.

7.1 What if you do not provide personal data?

You are under no legal obligation to provide data, but if you choose not to, we may be unable to process your application.

7.2 Automated decision-making

Recruitment decisions are not based solely on automated processing.

8.0 Data storage

Your data is stored on secure servers located within the EEA. It may be accessed worldwide by authorised personnel strictly for recruitment purposes.

9.0 Changes to this Privacy Notice

We may update this notice from time to time. We will notify you of any material changes.