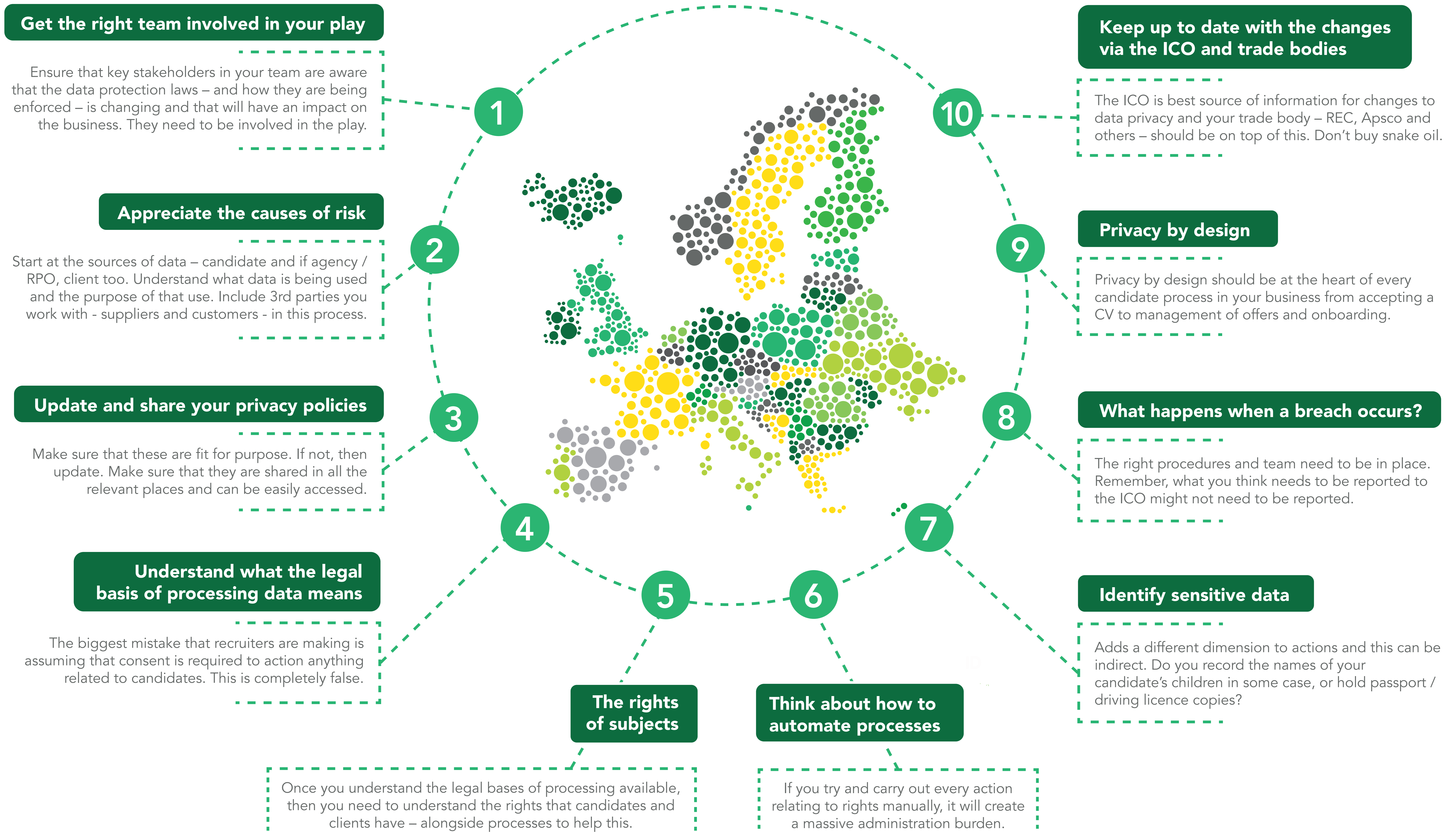


PREPARING FOR THE GDPR

10 ACTIONS FOR RECRUITMENT LEADERS



Contact us to make sure that your current database is compliant with the GDPR now and automatically moving forward. candidateid.com

Real-life scenarios

- Sourcing new candidates for current or future roles
- Your ATS or CRM and compliance with GDPR
- Managing the rights that candidates have relating to their data.
- Out of date information
- **Anything else we have time for!**

Hi Candidate!

[Your normal sourcing content here]

I recruit for this position on a regular basis, so I'll keep in touch with you and send you **[insert type of content]**.

You can find our privacy policy by clicking here. Making sure that you only hear from us on your terms is really important to us. So if you would rather I didn't contact you again, then say no by clicking here.

Cheers,

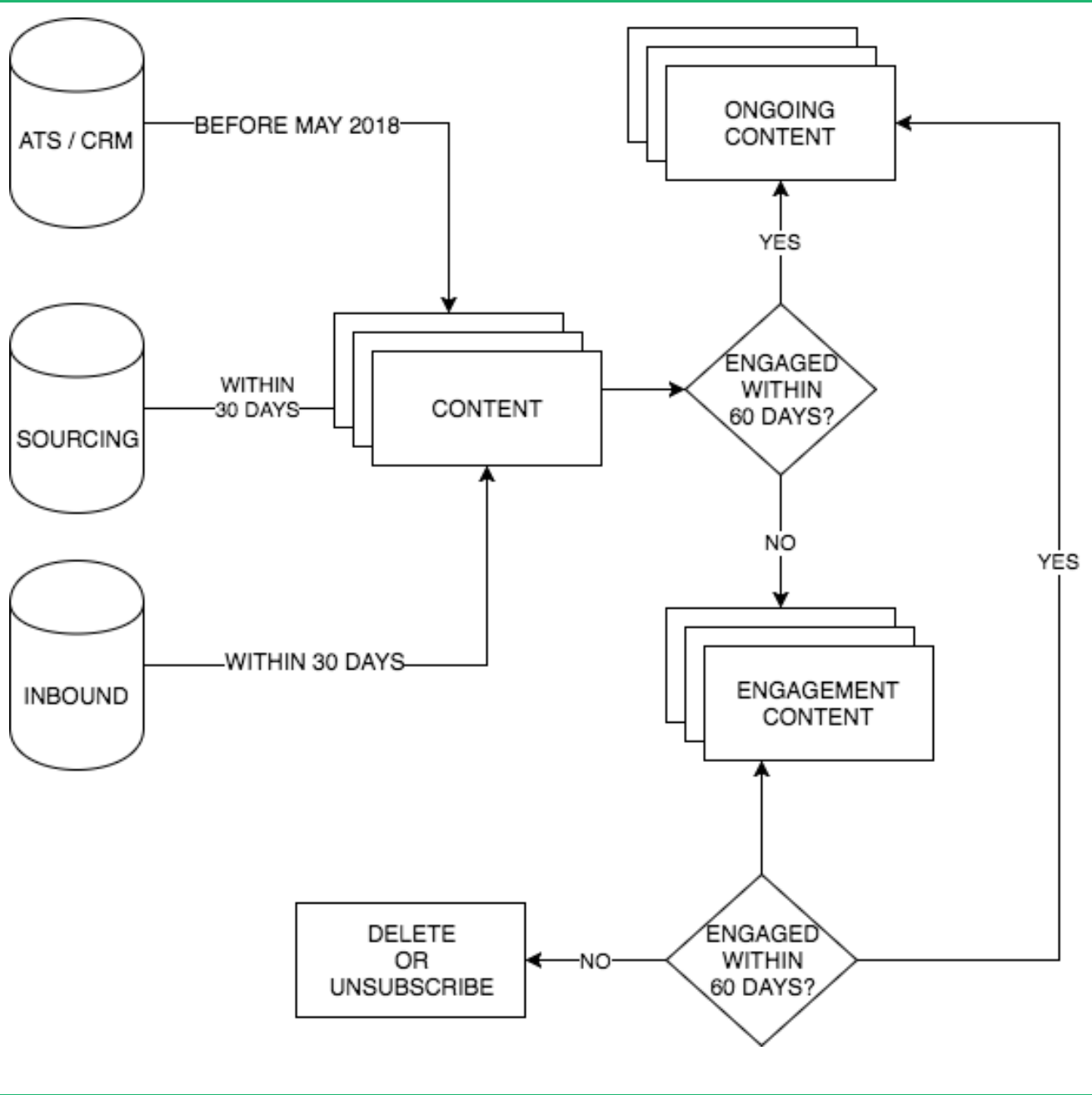
Billy McDiarmid



How and why



Transparent



On everything that a candidate sees include:

- Unsubscribe link
- Update my details link
- Preferences centre

Include in the body of the email the reason why you keep in touch with them - even if you have told already.

Be careful of adopting an opt-in process due to the consent paradox. It will also heavily reduce your database!

Legal basis of processing and the consent paradox

- You only need one - in recruitment your choices are **contractual** (i.e to pay someone), **legitimate interest** and **consent**.
- There is a problem with consent - it needs to be **freely given**.
- If someone refuses consent they cannot be **negatively impacted**.
- In a recruitment context, if consent is essential to be considered for vacancies, then it **isn't freely given**.
- If they refuse consent, then they should be able to be considered for roles - but this is **impossible** as you cannot **process** their data.
- **Legitimate interest** is the only option really available to you.
- This doesn't mean though that you can do what you want with candidate data!

Other considerations

- When processing, who holds the **balance of power** - you or the candidate?
- Is your processing activity **undermining / distressing / damaging** to the candidate?
- Make sure your recruiters know how to deal with **subject access requests** and other exercising of rights (right to be forgotten etc) - but don't give them the responsibility of managing these.
- **Automate** as much as your can including retention policies. You have no mandate to hold candidate information indefinitely.
- There is an issue with **diversity sourcing** because you are processing sensitive data.
- **OUT OF DATE** data is the biggest risk to recruiters.