



Privacy Notice - Applicants

Data controller: WDC, Whale and Dolphin Conservation, 7 Nelson Street, Plymouth, MA 02360 USA

As part of any recruitment process for employees or volunteers, WDC, Whale and Dolphin Conservation (WDC) collects and processes personal data relating to applicants. WDC is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

All data requests and retention comply with US federal and Massachusetts State mandates.

What information does WDC collect?

WDC collects and processes a range of information about you. This MAY include:

- your name, address and contact details, including email address and telephone number and date of birth;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers;
- information about your current level of remuneration, including benefit entitlements;
- information about your entitlement to work in the US;
- whether or not you have a disability for which the organization needs to make reasonable adjustments during the recruitment process;
- equal opportunities monitoring information including information about your ethnic origin, gender identity, sexual orientation and/or religion or belief.

WDC collects this information in a variety of ways. For example, data might be collected through information provided by you such as application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence, or collected through interviews or other forms of assessment.

In some cases, WDC may collect personal information about you from third parties, such as references supplied by former employers/supervisors and information from criminal records checks permitted by law. WDC will seek information from third parties during the application review process and will inform you that it is doing so.

Data will be stored in a range of different places, including, but not limited to, your application record and in WDC IT systems (which may include WDC's email system).

Why does WDC process personal data?

WDC needs to process data to take steps at your request prior to entering into a contract or agreement with you. It also needs to process your data to enter into a contract or agreement with you.

In some cases, WDC needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's entitlement to work in the US.

WDC has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data allows WDC to manage the recruitment process, assess and confirm a candidate's suitability for employment or voluntary roles and decide to whom to offer a position. The organization may also need to process data from applicants to respond to and defend against legal claims.

WDC processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment or volunteer positions.

Where the organization processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of equal opportunities monitoring.

For some roles, WDC will seek information through Criminal Background Checks to make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

If your application is unsuccessful, WDC will keep your personal data on file for 12 months in case there are future employment or voluntary opportunities for which you may be suited. You are free to withdraw your consent at any time.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and relevant recruitment team.

WDC will not share your data with third parties, unless your application advances in consideration for acceptance. WDC will then share only pertinent data in order to obtain pre-acceptance references from former employers/supervisors and complete necessary criminal records checks.

WDC will not transfer your data to countries outside the US with exception, in certain circumstances. For example, WDC's Headquarters in the United Kingdom may need to receive your information for Human Resources purposes. In such circumstances, your information will be shared through WDC's secure IT systems.

How does WDC protect data?

WDC takes the security of your data seriously. WDC has internal policies and controls in place to try 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. Accesses to IT systems are password protected.

For how long does WDC keep data?

If your application for employment or volunteering is unsuccessful, WDC will hold your data on file for up to one year after the end of the relevant recruitment process. At the end of that period (or once you withdraw your consent), your data is deleted or destroyed.

If your application for employment or volunteering is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained indefinitely. The applicant may submit a written request for data to be removed, at which point it will be held for 12 months after the conclusion of your affiliation with WDC and then deleted or destroyed.

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 WDC to change incorrect or incomplete data;
- require WDC 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 WDC is relying on its legitimate interests as the legal ground for processing; and
- ask WDC to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override WDC's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact Lucie Baker at 508-746-2522 or accounting@whales.org.

If you believe that the organization has not complied with your data protection rights, you can contact the Federal Trade Commission.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to WDC during the recruitment process. However, if you do not provide the information, WDC may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Automated decision-making

Employment and volunteering decisions are not based solely on automated decision-making.