COACH HOUSE

Privacy Notice for Job Applicants

Date last reviewed	27 October 2026
Next review date	October 2027
Responsible owner	Group Financial Controller

In accordance with the General Data Protection Regulation ("**UK GDPR**") and the Data Protection Act 2018, Chairs Limited trading as Coach House ("**Coach House**") ("**we**", "**us**", "**our**") has implemented this privacy notice to inform job applicants ("**you**", "**your**") about the types of personal data we process, why we process it, the lawful bases for doing so, how long we keep it and your rights. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

For this policy, Coach House is the data controller.

A) DATA PROTECTION PRINCIPLES

Under UK GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

a) processing is fair, lawful and transparent;
b) data is collected for specific, explicit, and legitimate purposes;
c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing;
d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay;
e) data is not kept for longer than is necessary for its given purpose;
f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisational measures; and
g) we comply with the applicable UK GDPR requirements for international transfers of personal data and can demonstrate compliance with these principles.

B) TYPES OF DATA HELD

We keep several categories of personal data about job applicants to carry out effective and efficient recruitment processes. We keep this data in recruitment files relating to each vacancy and may also hold the data within our computer systems, for example, recruitment logs or application systems.

Specifically, we hold the following types of data where necessary for the role and relevant stage of recruitment:

a) personal details such as name, address, phone numbers;
b) name and contact details of your emergency contact, where needed after offer or for onboarding;
c) your photograph, where necessary for identity or right to work checks;
d) your gender, and where relevant and lawful, information about disability or health (for example to arrange reasonable adjustments);
e) right to work documentation;
f) information on your race, ethnic origin and religion, where voluntarily provided for equality monitoring purposes;

g) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter. This also includes recruitment correspondence, interview notes and assessment results;
h) references from former employers;
i) details on your education and employment history etc;
j) driving licence (where relevant to the role); and
k) criminal conviction information, only where lawful and role-appropriate checks are necessary.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the recruitment process.

In some cases, we will collect data about you from third parties, such as employment agencies, job boards or application platforms, former employers when gathering references and, where appropriate and lawful, background-check providers. We may also receive applications through our website or directly by email. Where we manage applications through recruitment platforms, our use of your information is covered by this notice. Agencies and platforms may also process it for their own purposes under their own privacy notices.

Should you be successful in your job application, we will gather further information from you, for example, your bank details and next of kin details, for onboarding and employment purposes.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

The information below summarises the main recruitment processing activities and the lawful bases we rely on. Where legitimate interests apply, these include selecting suitable candidates, administering recruitment fairly and protecting our business interest, balanced against applicants' rights. We also rely on legitimate interests in monitoring equality of opportunity and retaining recruitment records to demonstrate fair recruitment and establish, exercise or defend legal claims. Where you separately opt in to retention for future vacancies, we rely on your consent.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled applicants	Legal obligation
Assessing applications and making recruitment decisions	Legitimate interests
Discussing proposed salaries and other benefits with applicants	Legitimate interests
Taking steps at the request of data subjects before entering into a contract	Article 6(1)(b) UK GDPR
Obtaining references and assessing suitability for the role	Legitimate interests
Dealing with legal claims made against us	Legitimate interests
Preventing fraud	Legitimate interests

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

a) health
b) sex life
c) sexual orientation
d) race
e) ethnic origin
f) political opinion
g) religion
h) trade union membership

i) genetic and biometric data.

We carry out processing activities using special category data:

a) where necessary for equality monitoring under UK GDPR Article 9(2)(g) and paragraph 8 of Schedule 1 to the Data Protection Act 2018; and
b) to determine reasonable adjustments, where necessary to carry out our legal obligations under UK GDPR Article 9(2)(b) and paragraph 1 of Schedule 1 to the Data Protection Act 2018

We will process special category data only where an applicable UK GDPR Article 9 condition is met and, where required, a condition under the Data Protection Act 2018 applies. Depending on the purpose, this may include employment-law obligations, substantial public interest in equality monitoring or explicit consent where appropriate. We will not assume that consent is suitable for every recruitment activity.

F) FAILURE TO PROVIDE DATA

If you do not provide information needed to assess your application or comply with legal requirements, we may be unable to progress your application or offer employment. Information requested solely for voluntary equality monitoring is optional and choosing not to provide it will not affect your application.

G) CRIMINAL CONVICTION DATA

We will only process criminal conviction data where appropriate to the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage; however, it may also be collected during onboarding. We use this data to assess suitability for relevant roles. We will only process criminal conviction information where we have an appropriate lawful basis under Article 6 UK GDPR and satisfy the additional requirements of Article 10 UK GDPR and the Data Protection Act 2018.

H) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment will have access to the data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with UK GDPR. We restrict access to those who need the information and require appropriate confidentiality and data protection safeguards.

We may share relevant applicant data with recruitment agencies, job boards or recruitment-system providers, reference and background-check providers, professional advisers, and public authorities where required by law. We may also share data where necessary in connection with a business sale or restructure. Appropriate contractual and security safeguards are used where third parties process personal data on our behalf.

Providers acting on our behalf may process your personal data outside the UK. Where restricted international transfers occur, we will ensure these arrangements are covered by UK adequacy regulations or appropriate safeguards, such as approved contractual protections. You can request details or copies of relevant safeguards using the contact details in this notice. Agencies and platforms processing data for their own purposes explain their transfer arrangements in their own privacy notices.

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

J) RETENTION PERIODS

We only keep your data for as long as necessary for the relevant recruitment purpose, taking account of legal requirements and potential claims.

If your application is unsuccessful, we will keep recruitment records for six months after the recruitment exercise ends. Then securely delete or destroy them. If a complaint, investigation or claim requires longer retention, we retain only relevant records for as long as necessary for that purpose.

If you separately opt in to retention for future vacancies, we will keep your CV and relevant contact and suitability information for that purpose for nine months after the recruitment exercise ends. We do not automatically include health, equality monitoring or criminal check information in this candidate pool. We delete or destroy the candidate-pool information at the end of that period or without undue delay if you withdraw consent earlier. This does not require deletion of recruitment records separately retained for the purposes and periods explained above.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

K) AUTOMATED DECISION MAKING

Automated decision-making means making decisions about you using automated processing without meaningful human involvement (e.g. using computerised filtering equipment). We do not make solely automated recruitment decisions that produce legal or similarly significant effects.

L) YOUR RIGHTS

You have the following rights in relation to your personal data subject to the relevant legal conditions and exceptions:

a) the right to be informed about the data we hold on you ;
b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy, and all such requests will be dealt with accordingly;
c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
e) the right to restrict the processing of the data;
f) the right to data portability, where the legal conditions for that right apply;
g) the right to object to processing based on legitimate interest, subject to applicable exclusions; and
h) rights in relation to solely automated decision-making, where applicable.

Where we rely on consent, you may withdraw it at any time. Withdrawal does not affect processing carried out before withdrawal. In some circumstances, we may retain or process information where a separate lawful basis applies.

If you wish to exercise any of these rights, please contact HR via email at hr@coachhouse.com.

M) MAKING A COMPLAINT

If you have concerns about how Coach House processes personal data in connection with your job application, please get in touch with us using the details above. You may make a complaint by email or by post (Chairs Limited t/a Coach House, Metcalf Drive, Altham Industrial Estate, Accrington, Lancashire BB5 5TU). We will acknowledge your complaint within 30 days of receipt. We will investigate your complaint and respond to requests without undue delay.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO) at www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.