

# **Kelda Job Application Privacy Notice**



**YorkshireWater**

## Document Control

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## Document Approval

Name	Name
HR Director	Data Protection Officer
Human Resources	Data Protection Team

## Document Revision History

Version	Date	Revised By	Reviewed By	Amendment Details
1	09/02/2026	Data Protection Team	Data Protection Officer	Annual review and transferred to new brand template

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This applies to all applicants applying for job vacancy within the Kelda Holdings Group.

This privacy notice tells you what to expect when YW collects personal information about you. When necessary a 'just in time' notice will be provided for any processing activity not covered by this document. However the information we will process about you will vary depending on your specific role application and personal circumstances.

Privacy Law means any Data Protection Legislation (for example the Data Protection Act 2018, UK GDPR and Data Use and Access Act 2025) and all other applicable laws and regulations relating to the processing of personal data as amended and replaced, including where applicable the guidance and codes of practice issued by the UK Information Commissioner Office (ICO).

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## 1. Introduction

Kelda Group is the parent company of Yorkshire Water and related business, for data protection purposes it is the data controller. Kelda is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. For the purposes of Privacy Law, the data controller is Kelda Group Ltd (company number 2366627/ ICO registration number Z7267989) registered at Western House, Halifax Road, Bradford BD6 2SZ.

## 2. Contacting Us

You can contact our Data Protection Team If you'd like to request further information about our Privacy Notice or exercise any of your privacy rights:

- Via the portal: <https://www.yorkshirewater.com/gdpr/>
- By email: [Dataprotectionofficer@yorkshirewater.co.uk](mailto:Dataprotectionofficer@yorkshirewater.co.uk)
- By post: Data Protection Officer, Kelda Group, western House, Halifax Road, Bradford, BD6 2SZ.

## 3. Your Privacy Rights

Under the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA), job applicants have a number of rights with regards to their personal data.

Job applicants have the right to request:

- To right be informed about the collection and use of personal data (job application privacy notice)
- To right to access your personal data and supplementary information on request (Subject Access Request (SAR))(for example request copies of your data obtained as part of the recruitment process)
- The right to rectification (to have inaccurate personal data rectified, or completed if it is incomplete)
- The right to erasure (this is not an absolute right. For example if we asked for your consent to process the information, and you withdraw consent)
- The right to restrict processing (for example if you've challenged the accuracy of the information we hold or have objected to our processing).
- The right to data portability (You have the right to move, transfer or copy data to another system for your own purposes)
- The right to object (where we process information we collect about you under the lawful basis 'legitimate interest'. You have the right to object to our processing your personal information under these lawful bases (including for marketing purposes and profiling).
- Rights in relation to automated decision making profiling (You have the right to request not to be subject to a decision based solely on automated processing, including profiling, which has an adverse effect on you.)

Not all of these rights are absolute and depend on our legal basis for processing the information, all requests will be reviewed on a case by case basis.

Any individual wanting to make a request to Kelda to exercise their rights, can do using the contact details in section 2.

For some of the roles, the recruitment process involves automated decision making to check if the candidate meets the basic requirement of the role ie. mandatory qualifications needed for the job or where the role requires you to hold a full UK driving licence and you do not hold this. Similarly, some of our online testing is marked and a result is generated automatically. However, if you wish to challenge the decision you have received, the result can be checked manually.

You are able to ask about decisions made about your job application by emailing [Careers@keldagroup.com](mailto:Careers@keldagroup.com)

#### **4. Complaints and queries**

Kelda tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage all candidates to notify us if they think that the collection or use of information is unfair, misleading or inappropriate.

Individuals can contact the Data Protection Team (contact details in section 2) in the first instance to raise any concerns or queries.

If you remain dissatisfied with the outcome of your complaint or query, after this has been addressed by the Data Protection Team, individuals can contact the ICO to complaint via:

- Website - <https://www.ico.org.uk> or
- Post:  
The Information Commissioner's Office  
Wycliffe House Water Lane  
Wilmslow:  
Cheshire:  
SK9 5AF
- Call on 03031231113

#### **5. What we collect and how we use it**

Kelda collects and processes a range of information about you when you apply for an available position. Please see the below examples of information that is collected:

- Your name, date of birth, address, contact details (including email address and telephone number)
- Details of your qualification, skills, experience and employment history
- Information about your current level of remuneration, including benefits entitlements

- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process
- Medical information
- Information related to equal opportunities monitoring
- Whether you have any criminal convictions
- Pre employment screening: DBS, right to work, enhanced DBS and additional security vetting as determined by role vacancy.

We may gather this information through various means, including application forms, CVs, online profiles, passports, identity documents or assessments. We will use the personal information that you have provided to:

- Manage the recruitment process (communicate with you in regard to your application(s)/ request(s), updates on progress of application etc)
- For background screening, pre-employment checks including DBS checks and internal vetting (as required)
- Assess your suitability for the role and make a decision to offer a job
- Responding to legal claims (if required)
- To fulfil legal requirements where required

### **5.1. Application stage**

If you use our online application system, the information will be collected by our data processor with whom we have a contract.

We will collect your name and contact details, previous experience, education, references, answers to questions relevant to the role, current salary and preferred salary. This may be by direct answers to questions or through the upload of a CV and cover letter.

Kelda values equality, diversity and inclusion we believe that everyone should be treated with respect. When applying for a job at Kelda, you may also be asked to provide equal opportunities information, that is classed as special category data, such as ethnic origin, sexual orientation, religion, beliefs, pronouns and military status. If you do not wish to provide this information as part of our recruitment process, this will not affect your application. You have the option to answer these questions with 'prefer not to say'. Any information you do provide in relation to this, will only be used to produce and monitor equal opportunities statistics.

As part of the application process, we will also ask you to confirm, by answering yes or no, whether you have any convictions which remain unspent under the Rehabilitation of Offenders Act 1974.

Anyone directly involved in the hiring process will have access to the information provided at application stage and this is limited to those with a legitimate need.

### **5.2. Shortlisting**

As part of the recruitment process, anyone directly involved will have access to the information they need to carry out shortlisting applications for interview. This includes

hiring managers and other authorised individuals who are responsible for assessing applications against the role requirements. Access is limited to those with a legitimate need.

### **5.3. Assessments**

You may be asked to participate in singular activities or a combination of the below for example:

- Interviews (face to face, virtual)
- Presentations
- Testing ( psychometric or personality tests)
- Assessment centres and all assessments complete at the assessment centres
- Technical assessments where you are required to demonstrate technical capability, as required in relation to the job role.

At this stage information will be generated by you and us, for example you may complete written tests and we may make interviews note. Any information generated will be held by us.

### **5.4. Conditional offer**

Due to the nature and environment of our work all offers of employment are conditional upon satisfactory completion of our pre-employment checks, via Agenda. These include:

- Proof of identity
- Right to work in the UK
- Employment references
- Employment verification
- Current address check
- Basic Disclosure criminal records checks

If the role you have applied for requires it, we may also obtain personal or character references using the information you provide directly.

In addition, for certain roles you may also be subject to additional checks (e.g financial, IT, Brand), these are also completed by Agenda and in line with role based risk assessment requirements:

- Directors check
- Additional security clearance
- Media check
- Counter Terrorism Check
- Finance check
- 5 year address history
- Employment gap analysis
- Sanction search

Certain roles may require an enhanced DBS check; this would apply to anyone having regular contact with an individual under the age of 18. For example, anyone working with our education teams.

In addition to the above, all our roles are subject to completion of a medical questionnaire, some operational roles have a requirement to carry out work in confined spaces so the completion of a medical and the relevant training courses are essential to being able to carry out these roles.

We will also ask about any reasonable adjustments required under the Equality Act 2010; this information may be shared with appropriate employees to ensure that any adjustments are in place prior to the commencement of your employment.

### **5.5. New Hire Onboarding steps**

Once you've completed the above and been successful, you'll need to provide further details as part of our onboarding process this includes bank details, medical information, next of kin or emergency contact details, your details for a driving licence check and information linked to payroll, such as student loan and pension.

### **5.6. After start date**

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and held in line with the retention period defined in the Kelda Employee Privacy Notice.

### **5.7. Secondments**

We also offer secondment opportunities to both internal employees and external applicants, if you are applying for a secondment position you will be subject to the recruitment process as documented above.

If you are an internal colleague we will request information connected to your current employment including current job title, length in role and any period of absence. We may also ask for referral information for specific role vacancies.

If you are an internal colleague applying for a secondment you may not be subject to the full recruitment process. For example, if we have already completed pre-employment checks, but you may still be subject to the assessments, proof of qualifications and further security checks should the role vacancy require this.

### **5.8. Unsuccessful applicants**

If your application for employment is unsuccessful, we will hold your data on our system for 6 months after the end of the relevant recruitment process. If at that point you agree

to us retaining your information for future employment opportunities, we will keep your data for an additional 6 months, making a total retention period of up to 12 months.

Job applicants have the ability to delete their online profile and any associated data at any time.

## 6. Lawful basis for processing

Privacy law states we must have a lawful basis for processing your information. We have identified the following legal bases on which we process your information, and this varies depending on how and why we have your information. The legal bases we use are:

**Consent:** the individual has given clear consent for you to process their personal data for a specific purpose. For example you provide your consent to retain your records after an unsuccessful application. Where you have provided consent to your processing you have a right to withdraw that consent at any time using the contact details in section 2.

**Legitimate Interest:** if the activities are for our business purposes and do not impede your rights as data subject. For example, managing end to end recruitment process and pre-employment screening, including DBS checks.

**Contract:** the processing is necessary for the performance of a contract to which you are part. For successful candidates, our processing of your personal data will also be necessary to enter into a contract with you for employment purposes and to ensure that we can comply with employment law and other legal obligations.

**Legal Obligation:** the processing is necessary for compliance with a legal obligation to which we are subject.

**Vital Interests:** the processing is necessary to protect your vital interests.

If we process any special category information, for example: personal data revealing racial or ethnic origin, trade union membership or data concerning health, we must have a further lawful basis for the processing. These further legal bases include:

**Explicit consent:** You give us your explicit consent to process your special category data. Information provided voluntarily in regard to equal opportunities (ethnic origin/religion etc). Any information you do provide in relation to this, will only be used to produce and monitor equal opportunities statistics. The article 9 legal basis for this processing is explicit consent, you have given us your explicit consent to process your special category data.

**Information on criminal convictions:** We may process information about criminal convictions and offences, for example information obtained through Disclosure and Barring Service (DBS) checks. Our Article 6 lawful basis is Public Task and Legitimate Interests. Processing is carried out in accordance with Article 10, schedule 1, part paragraph 1, paragraph 1 employment, social security and social protection and Schedule 1, Part 2, Paragraph 6(2)(a) substantial public interest.

## 7. Information we receive from third parties and how we use it

As part of our recruitment process we may also collect personal data about you from third parties. Please see the below information that is collected:

- References supplied by former employers/managers or personal / character references
- Information obtained through other forms of assessments including online tests (psychometric and personality testing)
- Information obtained via video screening (self-video interviews)
- Information obtained from external recruitment agencies
- Information obtained from pre-employment checks/ background checks / internal vetting (dependant on the level of screening required for the role.)

We will use the personal information provided by third parties to:

- To help us assess your suitability for the role
- Verify/validate the information provided as part of the recruitment process is accurate

Information from third parties, in some cases, will only be obtained once a job offer has been made and will inform you that we are doing so. Any job offer you receive is conditional on these checks being satisfactory.

## **8. Categories of recipients of personal data**

Your information may be shared with the following recipients:

- Internally with members of the Kelda Group (Human Resources Teams, colleagues involved in the recruitment process etc)
- Externally with companies who provide psychometric, personality testing or self-interview platforms
- Externally with a third party provider to undertake pre-employment checks, background checks, or internal vetting checks
- We may also share your personal data with a third party where required or permitted by law or to protect or enforce our rights.
- Externally with external auditors, when required.

Where we share data with third parties that process data on our behalf, we have formal contracts in place. This means they cannot do anything with your personal information unless we have instructed them to do so. They will hold it securely and retain it for the period we instruct.

## **9. Storing or transferring data outside the European Economic Area (“EEA”)**

Your data may be processed outside the European Economic Area (EEA) as some of our online IT support is outsourced from countries outside EEA. Kelda has a lawful data transfer mechanism in place to ensure the processing is subject to appropriate data protection safeguards.

## **10. What are the implications of not providing personal data?**

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, the minimal amount of information would need to be provided to allow us to progress your application and complete the checks once a conditional offer has been made prior to entering a contract. If you do not provide the mandatory information, we may not be able to process your application properly, or at all.

## 11. How does Kelda protect data?

We take the security of your data seriously. We have 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. The information you provide will be held securely by us and/ or our data processors whether the information is in electronic or physical format.

Where we engage with third parties to process personal data on our behalf, we do so on the basis of written instructions. They are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## 12. Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 09 February 2026.

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### Definitions of Terms Used:

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**Kelda**

Kelda is used in this document to refer to all subsidiary companies within the Kelda Holdings Limited group.