



# RECRUITMENT AND SELECTION PRIVACY POLICY

Version 1

06.10.2022

## Contents

1. Data controller	2
2. Categories of persons	2
3. Categories of personal data	2
4. Purposes and bases for processing	3
5. The processing of your personal data	4
5.1. General	4
5.2. Specific processing operations during the selection procedure	4
6. Recipients of your personal data	5
6.1. Internally	5
6.2. Externally	5
7. Retention period	5
7.1. Creation of an application	6
7.2. Application for a specific vacancy	6
7.3. Recruitment reserve pool	6
7.4. Employment	6
8. Your rights	7
9. Safeguards	7

## 1. Data controller

Hasselt University thanks you for your interest in our university and for your job application.

Hasselt University has drawn up this document to inform you about how we obtain, use and manage your personal data in the context of your application. This is because we understand your concerns about the processing of your personal data and wish to clearly indicate the purposes for which we process your personal data, the parties to whom the data are passed on, and the appropriate guarantees that are offered in accordance with the General Data Protection Regulation (GDPR), the Data Protection Law and any other applicable data protection regulations.

All applicants acknowledge that they have read the current Recruitment and Selection Privacy Policy (hereinafter the RSL Privacy Policy). Sending us your CV implies acceptance of the RSL Privacy Policy and the processing of your personal data by Hasselt University.

These personal data are processed under the responsibility of Hasselt University as data controller.

Applicants are required to cooperate in the selection procedure in good faith, and to provide all necessary data about their professional and educational background where these are relevant to the nature and conditions of the position. Applicants may not disclose any confidential information of which they may have become aware in connection with the recruitment and selection procedure.

## 2. Categories of persons

The RSL Privacy Policy applies to the following persons regardless of their nationality, place of residence or address:

- Any natural person who, as a result of an advertised vacancy, puts him- or herself forward as a candidate for the job as described in the vacancy and creates an application to this end in the online application module, and whose application is in the 'sent' stage, i.e. the **applicant**.
- Any natural person whose CV has been passed on to Hasselt University via a third party such as a recruitment firm or by recommendation or by unsolicited application, i.e. the **applicant**. Hasselt University will communicate the RSL Privacy Policy to the applicant at the time of initial contact.
- Any natural person who, as a result of an advertised vacancy, puts him- or herself forward as a candidate for the job as described in the vacancy and creates an application to this end in the online application module, and whose application is in the 'not yet sent' stage, i.e. the **prospective applicant**.

## 3. Categories of personal data

Hasselt University processes the following personal data – among others – in the context of the application and the selection process:

- Identification data: surname, first name, marital status, address, national register number;
- Data about your private life: email address, telephone number, date of birth, place of birth;
- Data about your education: education, training, diplomas, certificates;
- Data about your career: current position and responsibilities, previous positions and professional experience, date of departure, reason for departure, employment conditions and gross salary, salary expectations, skills and professional competence;
- Health assessment form for a safety-relevant position, a that requires heightened vigilance or an activity with a specific risk (Art. 1.4-46 of the Codex on well-being at work). This form does not contain any health data;
- If applicable, whether or not you hold a driving licence;
- Your photo if you have voluntarily provided us with one;

- Data resulting from personality tests and knowledge and competence tests: these data are only collected if, after an initial analysis, your CV seems suitable for the position. These tests always form an objective guide in our selection procedure and are accompanied by a professional assessment and extensive analysis by the Recruitment & Selection team at the Human Resources Department. Hasselt University may use the services of an external assessment agency to carry out these tests.
- If applicable, whether or not you have a work and/or residence permit for the European Economic Area (EEA);
- Digital data obtained from the Internet (social media presence), to the extent that these data are publicly available to us;
- Any personal data other than those mentioned above that must be processed by law.
- Any personal data that you provide us with in your application, in your CV or covering letter or via the free field in the application tool.
- Hasselt University's website uses cookies that may process your personal data such as IP address or navigation on the website. For more information about the use of cookies, visit the Hasselt University website to view our Internet and cookie policy.

Hasselt University strives to obtain all information that is relevant to recruitment and selection directly from the applicant. If Hasselt University deems it necessary, it will contact one or more previous employers to request information about you and your work experience, but after you have given permission for it to do so.

Hasselt University does not require certified copies of diplomas, certificates or attestations from the applicant before an employment contract is signed. In the event of any doubt about the veracity of the submitted or sent copy, Hasselt University may ask for the original document to be provided.

Hasselt University does not process sensitive personal data, for example concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, health or sexual orientation.

Hasselt University does not require an extract from the central criminal records (formerly known as the certificate of good conduct and character), other than for specific positions where this is required by law. Hasselt University may ask you to bring the extract from the central criminal records with you purely in order to view it and return it without processing.

#### **4. Purposes and bases for processing**

Hasselt University collects and processes your personal data where this is necessary for recruitment and selection. The processing will be proportionate to the position to be filled and confined to the data that are necessary to determine the extent to which your motivation, knowledge, skills, abilities and experience match the profile of the position for which you are applying or are being considered.

Hasselt University processes the above personal data on the grounds of various processing bases:

- where you have given your explicit consent to this:
  - example: forwarding your CV.
  - example: inclusion in a recruitment reserve pool as explained in more detail below.
  - example: contact with persons providing a reference.
- where the processing is necessary in order to take measures to ensure the smooth management of your commencement of employment before the conclusion of an employment contract or the statutory appointment.

- where the processing is necessary for the protection of Hasselt University's legitimate interests with a view to properly assessing your candidacy, provided that the interests and fundamental rights and freedoms of the applicant do not outweigh this
  - example: automatically sending an email before closing the vacancy to remind the prospective applicant of the final closing date of the vacancy.
  - example: forwarding your contact details to centres conducting tests, and processing test results.
  
- where the processing is necessary in order to comply with a legal obligation on the part of Hasselt University;
  - example: drawing up a certificate of attendance for VDAB, Actiris or Forem at the request of the applicant
  - example: where Hasselt University must process certain personal data on the basis of a specific legal obligation, such as when recruiting a security officer. The applicant will always be informed about these specific cases.

## **5. The processing of your personal data**

### **5.1. General**

The recruitment procedure and associated data processing start at Hasselt University when:

- you apply for a specific position
- a third party recommends you (e.g. a recruitment agency).

Hasselt University uses various channels to find the right person for a vacancy. We may do so through our own website, but may also conduct the search via third parties such as social media (LinkedIn, Facebook), job websites or recruitment and selection agencies. For specific positions or profiles, Hasselt University may engage a specialist agency to find a suitable candidate.

If your CV is processed by these third parties, it is recommended that you read their general terms and conditions and privacy policy to ascertain how they handle your personal data. Hasselt University cannot be held liable for the way in which these third parties handle your personal data, nor for the content published on their websites.

Hasselt University asks you to check the correctness and completeness of your data and to contact us if any changes have occurred or if you decide during the selection procedure that you are no longer interested in a job at Hasselt University.

### **5.2. Specific processing operations during the selection procedure**

Your diploma and your CV with an overview of your experience and reasons for applying will be assessed by Hasselt University to determine whether they meet the job requirements as stated in the advertised vacancy.

If you meet the job requirements, you will be invited to participate in the selection procedure.

The selection procedure consists of several elements. In the advertised vacancy you will find which elements will be involved for your particular application:

- Administration of selection tests (online or offline), which may consist of written, practical and/or psychological tests; these may be administered by an external assessment agency.

- Participation in an assessment at an external assessment agency.

## **6. Recipients of your personal data**

Hasselt University may process your personal data in the context of your recruitment and selection both internally and externally. Access to your personal data will be restricted to persons in positions as required for the processing of the information and will, in principle, only be provided on a need-to-know basis to the recipients who carry out the various processing operations.

### **6.1. Internally**

The staff members of the Human Resources Department deal with the internal processing of your personal data as listed under Article 3 and will therefore have access to your personal data in order to assess the suitability of your profile within Hasselt University and the specific department.

In addition to these staff members, the bodies and selection committees that decide on the selection will also have access.

### **6.2. Externally**

Hasselt University will not rent, sell or pass on personal data to third parties for financial gain. Personal data that can be traced back to individuals will only be provided to third parties if there is a legal basis or obligation for this, if it is necessary for the implementation of an agreement with the data subject, or if the data subject has explicitly consented to the transfer of the data.

Hasselt University is obliged to share your personal data with various external companies that provide services, such as specialist recruitment and selection agencies that put forward candidates, conduct initial interviews and administer personality and competence tests. These companies are directly subject to the legal obligations of GDPR. This means that your personal data will be protected by these organisations in accordance with the obligations imposed by GDPR.

Hasselt University may also instruct other third parties, such as IT providers, research institutes and so on, to perform tasks. In this case, Hasselt University will enter into an agreement with the third party concerned (processing agreement) in which it is stipulated that this party must handle any personal data that are provided in a lawful, confidential and careful manner.

Sometimes the employer is also obliged to communicate your personal data to government authorities, in which case the employer will always check that the legal and other conditions for doing so have been met.

## **7. Retention period**

Hasselt University will process your personal data for as long as they are necessary to achieve the purposes for which we need them. Different retention periods may be used depending on the context of the selection procedure.

After the retention period has expired, the data will be deleted.

Your data may possibly be kept for longer if this is necessary to defend us in the context of legal proceedings based on the application procedure.

It is possible that certain anonymised data may be kept for statistical reasons.

### **7.1. Creation of an application**

From the moment you create an application for a specific vacancy on the Hasselt University website, your personal data will be processed by us.

The status of your application will be updated until the closing date of the vacancy. This means that we can check whether the submission of your application is still being awaited. The application, with all the data already entered, will then be marked in the database as 'not yet sent'. This enables us to send you an email to remind you to submit your application. If you decide not to submit your application, all your personal data will be automatically deleted when the vacancy is closed.

### **7.2. Application for a specific vacancy**

Your personal data will be kept for at least as long as the application process is ongoing.

If your application leads to employment at Hasselt University, your personal data will be stored and used for your employment.

If your application does not lead to employment at Hasselt University, your personal data will be retained for two years after the vacancy has been filled or, failing that, after completion of the application process on the side of Hasselt University. This is done to make it possible to contact you if your profile seems suitable for a similar or different position within Hasselt University.

After this, your personal data will be automatically deleted. You may, of course, withdraw your application or request that your personal data be deleted at any time.

### **7.3. Recruitment reserve pool**

If Hasselt University selects a third party for a particular position, it will ask for permission from you to keep your profile as a 'ranked but not selected applicant' for two years. You may refuse or withdraw this permission at any time, after which Hasselt University will delete your personal data.

Hasselt University will wish to contact you during these two years if the same position becomes available or the first ranked candidate leaves, in order to offer you the position.

If a similar position is open, the recruitment reserve pool may also be used. In this case an additional selection test may be required.

If your profile appears to be suited to another position within Hasselt University, you may be contacted about a different vacancy that may be of interest to you.

### **7.4. Employment**

If you are recruited, the processing of your personal data by Hasselt University will be necessary for staff management, payroll administration, employment and compliance with Hasselt University's legal obligations, and Hasselt University may claim a legitimate interest. At the latest at the time of your commencement of employment, you will be further informed about the processing of your personal data by Hasselt University in the context of your employment at Hasselt University.

## **8. Your rights**

Hasselt University seeks to provide you with information in order to be as transparent as possible about the processing of your personal data during the recruitment and selection procedure. However, we understand that you may still have questions or would like additional clarification.

You therefore also have the right to view your personal data (your file) or to request a copy, to correct or delete or arrange for the correction or deletion of your data if they are found to be incorrect or incomplete and, in some cases, to restrict or arrange for the restriction of their processing. Where applicable, you may also request the transfer of your data to another controller. The exercise of these rights must be in accordance with the provisions of GDPR.

Where processing is based on your consent, you have the right to withdraw that consent at any time. This withdrawal of consent will only have consequences for the future.

If you wish, you may submit an explicit request to delete your data before the end of the retention period.

Hasselt University does not engage in automated individual decision-making that entails legal consequences.

For more information about the various rights and obligations in the field of privacy, you can consult our general Privacy Policy on the Hasselt University website.

To exercise your rights, you can contact [dpo@uhasselt.be](mailto:dpo@uhasselt.be) with proof of your identity. If you believe that your rights have been violated, you have the right to submit a complaint to the Data Protection Authority at any time.

## **9. Safeguards**

The tool with which you pass on your personal data to us is located on the servers of Hasselt University, as is the database where the data are kept. The Hasselt University server has sufficient safeguards in place to protect your personal data.

The employees process this information via Google Drive, the data on which end up on Google's servers.

Hasselt University attaches great importance to the protection of your personal data, which is why it takes appropriate technical and organisational measures to provide maximum security for your personal data and, in particular, to protect them against loss, alteration or unauthorised access.

Hasselt University therefore restricts the access rights to your personal data to those services, offices and/or persons for whom such access is required in order to fulfil the above-mentioned purposes. It also ensures that only those personal data are passed on that are required to achieve the more specific purposes. These access restrictions reduce the risks of loss of or unauthorised access to personal data.

The persons who have access to the personal data have or will receive training in the processing of personal data and how to handle personal data, and are bound by confidentiality clauses to ensure the integrity and confidentiality of your data.