



# Privacy Policy for Safer Recruitment

VIS is committed to protecting and respecting the privacy of prospective employees [Candidates]. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data supplied by candidates or other agencies will be processed by VIS in connection with its recruitment processes.

VIS uses ISS-Schrole Advantage, an online application, to assist with the recruitment process. VIS uses Schrole to collect, process and store personal information as a data processor on its behalf in accordance with its instructions and in compliance with its own Privacy Policies. VIS also uses the McDowell Agency Inc to conduct background checks to verify data supplied by the candidates.

Information VIS collects from Applicants

VIS collects and processes some or all of the following types of information from or about candidates:

- ◆ Information provided as part of the application process which includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- ◆ Personal details provided may include name, email address, address, telephone number, date of birth, qualifications, experience, information relating to employment history, skills experience, disclosures about criminal or civil arrests or convictions, photographic or national identification and confidential references from previous employers.
- ◆ Data obtained from social media and other data-base searches, either conducted by VIS or on its behalf by the McDowell Agency.
- ◆ Records of any correspondence with applicants.
- ◆ A record of progress through the hiring process.
- ◆ Details of a candidate's visits to the Schrole Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred the applicant to the Schrole Website and the resources that accessed.
- ◆ VIS may receive a candidate's personal data from a third party who recommends them as a candidate for a specific job opening.

Uses Made of Applicants Information

*Lawful basis for processing*

VIS relies on legitimate interest as the lawful basis on which it collects and uses personal data about candidates. The legitimate interest being the recruitment of staff for its business.

When an applicant applies for a job opening at VIS, VIS relies on the applicant's consent, which is freely given by them during the application process, to disclose personal data on the basis described below.



### *Purposes of processing*

VIS uses information held about applicants in the following ways:

- ◆ To consider their application in respect of a role for which they have applied.
- ◆ To consider their application in respect of other roles.
- ◆ To communicate with them in respect of the recruitment process.
- ◆ To validate and enhance any information received from candidates with information obtained from third party data providers.
- ◆ To determine the most appropriate candidate to fill job openings.

### *Disclosure of Candidate Information*

Any candidate who has been offered and who has accepted a conditional offer of employment, will be required to complete and submit a ***Disclosure and Consent Form*** with supporting documentation as an integral part of their application. VIS will only share the data collected relating to successful candidates with the McDowell Agency Inc in order to validate and verify the data supplied by them.

### *How Personal Data is stored*

#### *Security*

VIS takes appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost or used or accessed in an unauthorized way. VIS limits access to personal data to those who have a genuine business need to know it. Those processing the information will do so only in an authorized manner and are subject to a duty of confidentiality.

VIS also has procedures in place to deal with any suspected data security breach. VIS will notify applicants and any applicable regulator of a suspected data security breach where it is legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although VIS will do its best to protect personal data, it cannot guarantee the security of data transmitted through any online means, therefore any transmission remains at applicants' own risk.

### *Where Personal Data is stored*

Data relating to applicants will only be held on the Schrole servers in Australia or such other location as they deem appropriate (unless it is sent in via email in which case it will be stored in the school's domain in GSuite). Personal data relating to short-listed candidates will be downloaded, recorded, processed and stored on the school's Google Drive in a secure folder only accessible by senior administrators involved in the selection process. VIS's GSuite domain is currently stored on secure servers in the USA.



Data relating to candidates shared with the McDowell Agency Inc will be stored on that company's servers in the USA. Data collected and processed by the McDowell Agency in the form of a confidential report will be downloaded and stored in the candidate's secure folder on Google Drive.

Personal data relating to the successful candidate who is offered and accepted a position with VIS will be transferred to VIS's HR Management system (iSAMS HR Manager which stores data held on behalf of clients in the UK) and will be managed in accordance with VIS's Privacy and Data Protection policies and procedures relating to the collection, storage, processing and sharing of employee data.

For further information, please contact VIS (see 'Contact' below). VIS will not otherwise transfer personal data to any organization (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

#### *Data Retention*

VIS will only hold personal data relating to applicants and unsuccessful candidates until such time as appointments for all current vacancies have been filled, normally by the 30 June prior to the start of the new school year for which candidates have been appointed.

Personal data relating to successful candidates will be held for the period of employment and for 10 years after the termination of employment in accordance with applicable Laos PDR laws and regulations.

Personal information will be deleted on one of the following occurrences:

- ◆ Deletion of an applicant's personal information by the applicant.
- ◆ Upon written request from the applicant for VIS to delete the data.
- ◆ On conclusion of the recruitment process by the Head of School or designee.

#### *Applicant's rights*

Under internationally recognized General Data Protection Regulations, VIS recognizes that candidates have a number of important rights free of charge. In summary, those include rights to:

- ◆ access to personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- ◆ require correction of any mistakes in personal information which held by VIS
- ◆ require the erasure of personal data in certain situations
- ◆ receive the personal data relating to and provided by the candidate, in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations
- ◆ object at any time to processing of personal data for direct marketing
- ◆ object to decisions being taken by automated means which produce legal effects or similarly significantly affect you



- ◆ object in certain other situations to the continued processing of personal data
- ◆ otherwise restrict the processing of personal data in certain circumstances

Candidates who wish to exercise any of those rights, should:

- ◆ contact VIS using the Contact details below
- ◆ provide VIS with enough information to identify them
- ◆ provide proof of identity and address, and
- ◆ advise VIS as to the information to which the request relates.

## Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to [dataprotection@vislao.com](mailto:dataprotection@vislao.com)