



Digital Background Applicant Privacy Policy V1.0

Digital Background (“we”, “us”) respects your privacy and is committed to protecting your personal data. This policy informs you about how we handle your personal data when you use our websites and systems, and about your privacy rights.

We process personal data for applicants:

- Those whose checks are requested by our clients (employers, recruitment and volunteer agencies). For these applicants, we act as a data processor and our clients are the data controllers.

This policy applies whenever you visit our website, www.digitalbackground.co.uk or <https://app.digitalbackground.co.uk/>, use our systems, or provide us with your personal data. You must read and acknowledge this policy before submitting an application. If you disagree with our data processing methods, we recommend you stop using our website and systems.

This privacy policy is designed to inform you about how Digital Background gathers and uses your personal data, whether it’s data you’ve provided or data we’ve collected through your use of our website and systems.

Our website and systems are not designed for children, and we do not intentionally gather data about children.

We urge you to read this privacy policy in conjunction with any fair processing statement we may provide when we collect or process your personal data. This will ensure you fully understand our data usage practices.

Please note that our website and systems may include links to third-party websites. We do not control these third-party websites and are not responsible for their privacy statements.

Personal Data

Personal data refers to any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).



Digital Background's Role (Our Role)

Digital Background typically acts as a data processor, handling applicant personal data provided by our clients, such as employers and recruitment agencies.

As a data processor for applicants, we process your personal data to provide our clients with online vetting and screening services. We follow our clients' instructions in this process.

The personal data we may collect, use, store, and/or transfer about you depends on the checks requested by our client. This can include personal information, personal history, address information, ID information, contact data, technical data, usage data, profile and transaction data, and results data.

Please note that if you choose not to provide your personal data for the purposes outlined, we will not be able to process the checks by our clients on your behalf.

Applicants – Personal data processed on behalf of our client about you.

As previously mentioned, when you're an applicant, Digital Background serves as the data processor of your personal information. We handle your personal data to offer online vetting and screening services to our clients. In this context, our client is the data controller, deciding how your data is processed. We process your personal data strictly based on our clients' directives.



Personal data collected about you

For applicants, we may collect, use, store, and/or transfer various types of personal data based on our client's request. This can include:

- **Personal information:** Such as your name, date of birth, birth nationality, and place of birth.
- **Personal history:** Any changes in your nationality, surname, other known names, and any unspent convictions.
- **Address information:** Your previous 5-year address history.
- **ID information:** At least one of the following - national insurance number, national identity card details, passport details, or driving licence details.
- **Contact data:** Your email address and telephone number(s).
- **Technical data:** Information about your device and how you access our website and/or systems.
- **Usage data:** Information about how you use our website and/or systems, products, and services.
- **Results data:** 'Clear' or 'Wait for certificate'.

How your personal data is collected

We collect your personal data in several ways, including:

- **Direct interactions:** You might be asked to provide certain identity and contact information by filling out forms on our website or systems, or by corresponding with us via post, phone, or email. This includes information required to submit or complete a check using our website or systems.
- **Automated technologies or interactions:** As you use our website or systems, we automatically collect technical data about your device and browsing behaviour. We gather this personal data using cookies, server logs, and similar technologies. For more details, please refer to our cookies policy on our website.
- **Contact data:** This is provided to us by your current or prospective employer.



Purposes for which your data will be used

Below is an explanation of why we process your data as a data processor and the legal basis for doing so.

Keep in mind that we might process your data based on multiple legal grounds, depending on the specific use of your data. If you have any questions about this, feel free to contact us at governance@digitalbackground.co.uk.

- Type of data
 - Personal information
 - Personal history
 - Address information
 - ID information
 - Technical data
 - Usage data
 - Results data

- Purpose of data usage
 - We offer an online vetting and screening service on behalf of our clients, who could be your current or potential employer or representative.
 - The data processing required to complete a check might also encompass troubleshooting, data analysis, support, system enhancements, data reporting and hosting.

- Lawful reason for processing
 - As a data processor, Digital Background operates on behalf of our client (the data controller) and depends on our client's legal grounds to process your personal data as per our client's directives. Please consult the privacy notice(s) of your current or potential employer, or recruitment or other agency, to comprehend their legal grounds for sharing your personal data with us for the purpose of carrying out your vetting and screening checks. As an applicant, your contractual relationship is with our client, not Digital Background.



Disclosure of your personal data

For certain reasons, listed below, we might have to share an applicant's personal data with other parties.

- Banks, lawyers, insurers based within the UK who provide their services to Digital Background.
- Authorities such as HM Revenue & Customs and other regulators, who act as processors or joint controllers in the UK, may require us to report processing activities under certain conditions.
- Service providers, acting as processors, who carry out external identity verification and authentication for applicants as part of a DBS check.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We mandate all third parties to uphold the security of your personal data and handle it in compliance with the law. Our third-party service providers, acting as sub-processors, are prohibited from using your personal data for their own objectives. We only allow them to process your personal data for specific purposes and as per our directives.

We will use your personal data solely for the stated purposes, unless we find a reasonable need to use it for a different purpose that aligns with the original one. If you ever want to understand how the processing for a new purpose aligns with our original purpose, feel free to contact us at governance@digitalbackground.co.uk.

If we must use your personal data for a purpose not originally stated, we will inform you and clarify the legal grounds that permit us to do so. Be aware that, in accordance with the above rules, we might process your personal data without your awareness or consent if the law requires or allows it.

Marketing

Digital Background does not use your personal data for any marketing purposes.



Retention and security of your data

Digital Background is committed to providing the best possible security measures. Here are some of the great features on our system.

Solid and robust, we employ 256-bit encryption to store data on our systems with a unique key per customer.

All our data resides in ISO27001 certified UK datacentres.

We are 'Cyber Essentials' certified.

Our systems are fortified with state-of-the-art defences. At the forefront is our web application firewall provided by Cloudflare, meticulously designed to thwart any attempt by hackers to breach our defences and compromise your valuable data. Additionally, our servers and databases stand resilient against threats, shielded by Microsoft Defender for Cloud. With our robust measures, your data remains secure, ensuring peace of mind.

We will keep your personal data only for the time needed to accomplish the purposes for which it was gathered. This includes meeting any legal, regulatory, tax, accounting, or reporting obligations. In case of a complaint or if we foresee potential legal disputes in our relationship with you, we might hold onto your personal data for a longer duration.

- Incomplete applications automatically have all personal data removed 90 days after being added to the system.
- Complete applications, with results, have all personal data removed 180 days after the result is received from the governing body i.e. DBS.
- All applications that have had personal data removed are permanently deleted from the system 180 days after personal data removal.



Your rights as an applicant

Data protection laws, under certain circumstances give the following rights to your personal data.

You have the right to request a copy of your personal data from us, a process often referred to as a “data subject access request”. This right is always in effect, although there are certain exceptions which may result in you not receiving all the data we process. For more detailed information about this right, please visit the ICO’s website at the following link:

<https://ico.org.uk/your-data-matters/your-right-of-access/>

In relation to this right:

- **In the context of access management**, when Digital Background functions as a data processor (please refer to the ‘Our Role’ section above for more details), we are obligated to support the data controller in handling access requests related to your rights as a data subject. As such, any data subject access requests from applicants will be forwarded to the controller (the client of Digital Background), and we will provide necessary assistance in their response.
- **Charges**: Typically, you won’t need to pay a fee to access your personal data or to exercise any of your other rights as outlined here. However, if your access request is evidently baseless, repetitive, or excessive, we may impose a reasonable fee. In such situations, we also reserve the right to decline your request.
- **Required Information**: To confirm your identity and validate your right to access your personal data (or to exercise any of your other rights as detailed here), we might need to ask for specific information from you. This is a precautionary step to prevent the unauthorized disclosure of personal data. To expedite our response, we may also reach out to you for additional information related to your request.
- **Timeframe for Response**: Our aim is to respond to all valid requests within a span of one month. However, if your request is notably intricate or if you’ve made multiple requests, it might take us more than a month to respond. In such situations, we will keep you informed and provide updates on the progress.



Your rights as an applicant (continued)

Erasure: You have the right to request the deletion of your personal data. This allows you to request us to erase or remove personal data when there is no valid reason for us to continue processing it. You also have the right to request us to delete or remove your personal data if you have successfully exercised your right to object to processing, if we may have processed your information unlawfully, or if we are obligated to erase your personal data to comply with local law. However, please note that we may not always be able to fulfil your erasure request due to certain legal reasons, which, if applicable, will be communicated to you at the time of your request. For more information about this right, please visit the ICO's website at the following link: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/>

Correction: You have the right to request a correction of your personal data that we possess. This allows you to rectify any incomplete or inaccurate data we have about you, although we may need to confirm the accuracy of the new data you provide. This right is always applicable. More information about this right can be found on the ICO's website at this link: <https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected/>

Please be aware that once you submit an application through our system, we are unable to amend any information you have included in that application without retracting the application itself. Therefore, to correct information already submitted via our system, a new application would need to be submitted, which would incur a new application fee. Upon submission of an application, the only personal data Digital Background retains about you is contained within the record of the application you have submitted. If you have any questions regarding this, please contact us at: governance@digitalbackground.co.uk.

Processing objection: You have the right to object to the processing of your personal data when we are doing so based on a legitimate interest (or those of a third party) and you believe that this processing infringes on your basic rights and freedoms. You would also have the right to object if Digital Background were to use your personal data for direct marketing purposes. However, since we do not engage in this practice, this right is not applicable. In certain situations, we may show that we have compelling legitimate reasons to process your data which supersede your rights and freedoms. For more information about this right, please visit the ICO's website at the following link: <https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/>

Restrict processing: You have the right to request a limitation on the processing of your personal data. This allows you to request us to pause or limit the processing of your personal data under specific conditions. For more information about this right, please visit the ICO's website at the following link: <https://ico.org.uk/your-data-matters/your-right-to-limit-how-organisations-use-your-data/>



Your rights as an applicant (continued)

Data transfer: The right to data portability. This right is applicable only to the information that you have provided to us. You are entitled to request that we transfer the information you provided from one organization to another, or directly to you. This right is only valid if we are processing information based on consent, under, or in discussions about entering into a contract, and the processing is automated. For more detailed information about this right, please visit the ICO's website at the following link: <https://ico.org.uk/your-data-matters/your-right-to-data-portability/>

Withdraw consent: You have the right to revoke your consent at any point if we are processing your personal data based on that consent. However, please note that this will not impact the legality of any processing that occurred prior to your withdrawal of consent. If you choose to withdraw your consent, we might be unable to offer certain products or services to you. We will inform you if this is the case when you withdraw your consent.

To find out more or to exercise any of the above mentioned rights please contact governance@digitalbackground.co.uk



Applicant privacy policy changes

This applicant privacy policy will periodically be reviewed and updated as required.

New versions of the document will be available on our website and during the applicant data entry process.

Contact details

Email : governance@digitalbackground.co.uk

Post:

Digital Background Limited,

The Apex

Derriford Business Park

Brest Road

Plymouth

PL6 5FL.

Raise a complaint

At any time, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's regulatory body for data protection matters (www.ico.org.uk). However, we would value the opportunity to address your concerns before you reach out to the ICO, so we kindly ask that you contact us initially.