

# BT Recruitment Privacy Notice

("Notice")

Last Updated in May 2025

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# 1 Introduction

BT Group is a group of companies made up of BT Group plc and BT plc, and all subsidiaries of these companies, including Openreach Ltd, EE Ltd and Plusnet plc (together “BT”, “we”, “our” or “us”). We are committed to fair data protection practices, including when processing personal information of candidates and prospective employees or apprentices (together “**Candidates**”, “**you**”, “**your**”).

This Notice provides information to Candidates about our practices with respect to the use of personal information we may process about you as part of the recruitment process. It sets out examples of the types of personal information BT may process about you as part of your Recruitment, the sources of that information and the uses to which it can be put, shared and transferred. The Notice also explains how long personal information will be kept for and your rights in relation to your personal information. Details of who to contact if you have any queries or concerns are also provided.

We want you to be confident we’ll protect your personal information and respect your privacy.

This Notice applies to Candidates based inside the UK. For Candidates based outside the UK, there will be local versions with appropriate variations.

If you become an employee of BT, your personal information will be processed in accordance with our Colleague Privacy Notice.

This Notice is not intended to create a contract with you.

We may also provide Candidates with additional information when we collect personal information. That additional information should be read together with this Notice.

The controller of Candidate data is the BT Group entity that decides the purpose and the means by which any Processing of Data will be carried out. In most circumstances that will be the BT entity that you register your profile with or apply for a role with.

## 2 Sources and types of data collected

Personal data or personal information is any data which identifies you, directly or indirectly or from which you are identifiable.

We will generally collect personal data directly from you, including the personal data requested from you, or that you otherwise provide, as part of the recruitment process or in response to any surveys/questionnaires. The personal data we collect from you depends on your circumstances, role and the law.

To the extent permitted by law, and where necessary to achieve the purposes of processing, we may also collect personal data about you from other sources and third parties, including the following:

- Government organisations such as to ensure compliance with taxation laws, verify your identity and obtain, DBS checks to obtain details relating to criminal offences proceeding and/or convictions or anything that would restrict your ability to work
- Public authorities, financial institutions and Cifas to evaluate your eligibility for employment for certain positions
- Recruitment agencies (including executive search agencies)
- Nominated referees
- LinkedIn profiles or profiles on other job-related sites
- Other publicly available information that may be posted on the internet, in newspapers, social media etc. where used in connection with investigations or vetting checks, or which is otherwise brought to our attention or available to us.

The personal data that we collect includes:

- **Application Data** that we collect (or that is created) from you during this recruitment process (either directly from you or from a third party) such as your application form(s), CV, records of qualifications, professional memberships, right to work and ID documents (such as passports, driving licence and visas or birth certificate), references, current job title, remuneration in your current role, training, referees and other compliance information;
- **Recruitment Process Data** including any interview notes and records, information you provide us during an interview, presentations, assessments, psychometric or competency test responses and results, accessibility requirements, photographs and video recordings of you and any correspondence generated during your recruitment;
- **Contact Data** such as your name, home address, phone number (work and home), date of birth, email address (work and personal), your national insurance number, next of kin and emergency contact details;
- **Diversity Data** such as your gender, gender identity, relationship status, nationality, citizenship, preferred languages, race, ethnic background, religion or belief, sexual orientation, health related information (for specific roles), disability;
- **Application Data for Internal Roles** including information included in your HR file such as information about your current work contract, salary, pay, pension, share plans, benefits, attendance and performance, start date, place(s) of work, goals, development notes and plans, records of your training and progression, leave, grievances, disciplinary matters, conduct matters and other compliance requirements. We may also process your health and disability related information, including accessibility requirements and occupational health reports, and any health-related information that may affect your employment or the safety of our workforce, customers and/or the public.
- **Other Information** generated when you visit our premises, where relevant, including pass card, information regarding your attendance and use of our premises images, recordings and footage from CCTV.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose, which may be derived from your personal data but is not considered personal data. If we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, it will be used in accordance with this Notice.

### 3. Purposes for processing data

To the extent permitted by law and where necessary, BT processes your personal data, such as that set out above in section 2, for the following purposes:

Purpose	Lawful Basis
Processing your application including communicating with you about roles you have applied for, assessing your application, inviting you to interview.	Necessary for the purposes of a contract  Legitimate Interests (to process applications effectively and efficiently)
Making you an offer and inviting you to undertake onboarding	Necessary for the purposes of a contract  Legitimate Interests (to process applications effectively and efficiently)
Assessing other information available to us aside from your application, where we are legally permitted to do so (such as where you have worked for BT Group previously, we will consider your previous reason for leaving or whether you have applied for a role in the last 6 months).	Legitimate Interests (to process applications effectively and efficiently)
Complying with applicable statutory, regulatory legal obligations and our policies, such as, those relating to health and safety; equality of opportunity and treatment and diversity requirements as an employer.	Legal obligation
Monitoring equality of opportunity and treatment and promoting or maintaining racial and ethnic diversity at senior levels, including by ensuring that we present diverse shortlists for roles wherever possible	Legitimate Interests (to ensure that we have a diverse business)
Providing you with details of roles that may be of interest to you either because you have been added to a 'talent pool' or because you have asked to hear from us about roles.	Consent

Carry out background and reference checks, where applicable	Legitimate Interests (to ensure that you are suitable for the role)
Surveys or request feedback from you (such as to obtain reasons why you have declined a role if relevant)	Legitimate interests (to improve our business and our application process)
Equal opportunities monitoring	Legitimate interests (to ensure our application process is fair)
Make reasonable adjustments to the recruitment process based on accessibility requirements	Legitimate interests (to ensure our application process is fair)  Necessary for the purposes of a contract
For analytics purposes related to planning, running, managing and improving our business	Legitimate interests (to improve our business and our application process)
To monitor our offices and our systems for security reasons	Legitimate interests (to protect our business)
Emergency medical situation	To protect the vital interests of the data subject
Crime prevention including taking measures to protect our business by preventing fraud and detecting crime such as by carrying out credit, fraud and criminal records checks, where appropriate	Legal Obligation  Legitimate interests (to protect our business)
Compiling and managing our case in a legal claim made by us or against us.	Legitimate interests (to protect our business)

Where any of these purposes listed above involve the processing of special category data (being data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, concerning a person's sex life or sexual orientation or genetic, biometric or health data) or criminal convictions or offence data, this will only be done where we have a relevant 'special category condition'. The special category conditions we rely on include:

- you have given your explicit consent;
- we are required or authorised to carry out the Processing due to applicable employment or social security laws;
- it is necessary to protect your vital interests;
- it is necessary for us to establish, exercise or defend a legal claim or in response to the requirements of a court;
- there is a substantial public interest in the processing for example so that we can monitor equality of opportunity and treatment or promote or maintain racial and ethnic diversity at senior levels.

*Automated Decision Making*

In some limited circumstances we may use automated decision-making tools to review and progress applications, depending on responses to assessments. Where we are using such tools in relation to a role you are applying for, you will be informed as part of the application process and given further details about the tool. You have a right to contest any decisions made by the tool at any time by contacting the us at [cpo@bt.com](mailto:cpo@bt.com).



## 4. Transferring, sharing and disclosing data

As set out below, BT may share personal data for the purposes set out in part 3 above either:

- a) within the BT Group that are located around the world; and/or
- b) with external third parties.

- **Data sharing within the BT group of companies**

All BT entities are part of the BT Group operating internationally. All members of the BT Group may support and interact with each other in the recruitment process. Candidates' personal data may be accessed by any of the BT Group recruitment teams on a worldwide basis where there is a legal basis to do so.

Data will be processed by appropriate BT personnel, which may include Hiring Manager, and the Human Resources team and the Recruitment team where relevant. Some of the personnel and IT systems processing Data may be located outside of the UK. We have entered into a group wide arrangement, known as Binding Corporate Rules, to ensure your personal data continues to be subject to an adequate level of protection, regardless of which company in the BT Group holds that information.

We have a [UK](#) and [EU](#) version of the Binding Corporate Rules which apply to the personal data of UK and EU individuals respectively. They include a list of countries which are structured to allow us to transfer personal information to the countries where we have a presence. For us, after the UK and wider EU, India and the Philippines are where most of our processing of personal data takes place.

All processing of Candidate personal data is subject to security measures and internal controls established under applicable BT Group policies and is restricted to what is legally permissible, relevant and proportionate for the relevant legitimate purpose of the processing.

- **Data sharing with third parties**

BT needs to engage with third parties to run every aspect of its business. This means that in certain circumstances your personal data needs to be shared with third parties outside of BT. Third parties that BT shares Data with will include the following:

Organisations who provide products and services to us and who help BT carry out its business activities. For example: IT /software providers and developers (such as cloud providers and providers of communications services)
Organisations who assist us with our recruitment and selection activities.
Organisations, who on our behalf, conduct surveys or issue questionnaires to request feedback on the recruitment process
Psychometric testing service providers to assist us in assessing for example, numerical, verbal reasoning, ability and/or potential
Law enforcement agencies who need to see Data so they can detect and stop crime, prosecute offenders and protect national security

Public authorities, for example, the disclosure of information to the Department of Work and Pensions in benefit cases, or to HMRC for tax purposes
Organisations who may provide funding or grants to BT and require Candidate personal data to do so
Recruitment agencies who assist us in seeking Candidates

In all cases we will only share your Data in accordance with applicable law. We have strong internal oversight of what and how we disclose and we take expert advice to inform our approach. Where we share your personal data with a third party, we have strict controls in place to ensure your personal data is properly protected and we only provide the minimal information necessary for that purpose.

Whenever we transfer personal data to a third party outside of the UK or EEA, we ensure that appropriate safeguards are in place by using appropriate Data transfer mechanisms such as an 'adequacy' decision adopted by the UK or the EU (as appropriate), or under another applicable method such as approved Standard Contractual Clauses.

## 5. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

For example, we apply the following retention periods during our recruitment process:

- Recruitment records (including but not limited to profile and application) for unsuccessful Candidates are kept for no longer than 12 months after notification of the outcome of your initial application
- Recruitment records for successful Candidates are kept for no longer than 6 years after your employment ceases
- Where you agree to be part of a talent pool your data will be held in that talent pool for 12 months after notification of the outcome of your initial application, following which we will contact you to ask you whether you wish to remain in the pool

Once data is no longer necessary we will delete it or anonymise it so that you cannot be identified and it can no longer be associated with you.

## 6. Your rights

Under certain conditions, you may have the right to ask us to fulfil one or more of the following requests.

- **Right to access personal data:** You can request confirmation about the personal data that we process about you and request a copy of the personal data and certain other information about the processing.
- **Right to correct personal data:** You can request that we correct any errors in the personal data we hold about you.
- **Right to restrict or erase personal data:** You can ask for the processing of your personal data to be restricted or for your personal data to be deleted in certain circumstances.
- **Right to portability:** You have the right, in some cases, to receive your personal data in a digital format or to have it transmitted directly to another controller (where technically feasible).
- **Right to object to processing:** You can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the personal data to meet a contractual or other legal requirement).
- **Right to withdraw consent:** Where we process your personal data on the basis of your consent, you can withdraw that consent at any time by using the contact email in section 7 below. However, your withdrawal of consent only applies to how we use your personal data in the future, not what we've done in the past.
- **Right not to be subject to automated decision making:** you can contest any automated decisions made using your personal data during the recruitment process.

When you make a request, it will normally take us up to one month to fulfil that request but could take longer (up to a further two months) if it's a complicated request or you send us multiple requests.

The rights set out above are not always applicable or may be limited under UK legislation. Under certain circumstances, BT may not be required to action a request for these reasons. BT will inform you of relevant exemptions we rely upon when responding to any request you make.

If you are not happy with how BT has responded to any request, you also have the right to complain to the data protection authority where you live or work, or where you believe a breach has occurred. In the UK the relevant data protection authority is the Information Commissioner's Office ([Information Commissioner's Office \(ICO\)](#)).

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you – this will include personal data that is necessary to perform our contract with you, information needed to check your right to work and to manage your performance. Failure to provide certain information may be a breach of an agreement you may have with us. Where personal data is optionally provided, for example details of an emergency contact, there may be some adverse consequences if you refuse to provide this.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your Data changes during your relationship with us (in particular, your bank account number and any changes in your contact data).

## 7. Contacting your Controller

To exercise any of the rights listed in section 6 above, or if you have any queries, concerns or complaints about the way that BT uses your personal data (or any questions about this Notice), you can submit a request using [this form](#) or alternatively to [cpo@bt.com](mailto:cpo@bt.com)

You can also contact your recruiter with your queries or concerns but using the contacts above will better direct your query to our Data Privacy team. If you are unsure of the identity of your Controller, please ask your recruiter who will be able to obtain assistance from our Data Privacy team, if needed.

BT's data protection officer can be contacted by email at:

[cpo@bt.com](mailto:cpo@bt.com) or post at:

Data Protection Officer  
Level 16  
BT One Braham  
1 Braham Street  
London  
E1 8EE

If you'd like any more details or have any comments or questions about this notice you can contact us using the details above.

If you are not satisfied with our response or believe that we are not using your Data in line with the law, you have the right to complain to the UK data protection regulator (Information Commissioner) whose contact details can be found by using this link: <https://ico.org.uk/>

## 8. Modification to the notice

We might change this Notice from time to time and will post updated versions. We will provide a new Notice when we make any substantial updates, and we may also notify you in other ways from time to time about the processing of your personal data.








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Registered office: 1 Braham Street, London E1 8EE

Registered in England No. 1800000



**BT Group**

