greater•jobs

Applicant Tracking System

Privacy Notice

Jobtrain System

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1. Introduction

This Privacy Notice explains how your personal data is collected and used when you create an account or submit a job application through the greater.jobs Applicant Tracking System (ATS). The ATS is used by a collaboration of public sector employers and is provided and hosted by Jobtrain Ltd.

This Notice applies only to personal data processed within the ATS. Each recruiting organisation is responsible for its own recruitment decisions and has its own recruitment privacy notice.

2. Who We Are

2.1 Participating Employers — Data Controllers

greater.jobs is operated on behalf of a collaboration of public sector employers. Each employer is the **data controller** for any application you submit to its vacancies.

2.2 Jobtrain Ltd — Data Processor

Jobtrain provides and hosts the ATS and processes personal data on behalf of all greater.jobs employers. Jobtrain applies industry-standard security measures.

2.3 greater.jobs Team (Wigan Council) — Data Processor

Authorised staff support ATS administration (e.g., user account support, system configuration). These activities are carried out **on behalf of the employers**, so the greater.jobs team acts as a **processor**, not a controller.

2.4 Contact Information

- **ATS technical queries**: support@jobtrain.freshdesk.com
- **Recruitment queries**: contact the recruiting employer listed in the vacancy

3. Personal Data We Collect

3.1 Information you provide

- Name, title and email address (for account creation)
- Password
- Application information (experience, qualifications, responses)
- CV and supporting documents
- Referee details

3.2 Talent Pool (optional)

If you opt in, you may add job preferences and upload a CV.

3.3 System-generated data

- Account activity
- Application workflow and status
- Security, authentication and access logs

3.4 Special category and criminal record data

If requested for specific roles (depending on the employer):

- Equality and diversity information
- Health or adjustment information
- Criminal record declarations

These are processed under the employing organisation's legal basis, not under Jobtrain's or greater.jobs' legitimate interests.

4. How Your Data Is Used

4.1 ATS system administration (Processors)

Jobtrain use your data to:

- manage ATS user accounts
- provide technical support
- maintain security, logs and system resilience

4.2 Recruitment processing (Controllers)

Recruiting employers use the ATS to:

- review your application
- contact you throughout the process
- shortlist and interview
- complete pre-employment checks
- operate Talent Pool features (if applicable)

5. Lawful Bases for Processing

5.1 ATS operation (Jobtrain and greater.jobs) and security (Jobtrain)

Lawful basis: *Legitimate Interests* (Article 6(1)(f) UK GDPR)

Processing is necessary to operate, secure and administer the ATS. A Legitimate Interests Assessment is maintained.

5.2 Recruitment processing (Recruiting Employers)

Recruiting employers rely on:

- **Article 6(1)(b)** — steps necessary prior to entering into a contract
- **Article 6(1)(c)** — legal obligations (e.g., right to work checks)
- **Article 9(2)(b)** + Schedule 1 Part 1 DPA 2018 — employment law basis for special category data
- **Article 10** + Schedule 1 DPA 2018 — criminal record data where legally required

6. Who Can Access Your Data

6.1 Recruiting Employer (Controller)

Any application you submit is accessible **only** to the employer offering the vacancy.

6.2 greater.jobs Team (Processor)

Access is limited to activities necessary to administer ATS accounts and system functions.

6.3 Jobtrain Ltd (Processor)

Provides secure hosting and technical support with:

- SSL encryption
- firewalls
- secure servers
- ISO27001-aligned controls

6.4 Third parties (on employer instruction)

Examples include:

- DBS services
- occupational health providers
- referees

7. Talent Pool

If you opt into the Talent Pool, selected employers may contact you about suitable roles. You can update or remove your preferences at any time.

8. International Transfers

If Jobtrain or its sub-processors transfer data outside the UK, appropriate safeguards (e.g., UK IDTA, UK Addendum or adequacy decisions) will be applied.

9. Retention

Recruiting employers determine retention periods for application data, and the ATS applies those retention rules. Security logs are retained for a limited period.

10. Your Rights

You may request:

- access to your data
- correction of inaccurate information
- erasure (where applicable)
- restriction of processing
- objection to processing based on legitimate interests
- a complaint to the ICO

Consent is *not* the lawful basis for ATS processing, so there is no right to withdraw consent.

11. Security

Jobtrain uses secure servers, encryption, firewalls and ISO27001-aligned controls to protect your data.

12. Cookies

The ATS uses cookies for essential functionality, security and analytics. See the ATS Cookie Policy for details.

13. Updates

This Notice may be updated periodically.