



An Coimisiún  
um Rialáil Fóntas  
**Commission for  
Regulation of Utilities**

## Recruitment Privacy Notice

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In order to fill vacant positions, the CRU will collect and store personal information you submit to us in your capacity as candidate or job applicant. We have drafted this Privacy Notice in an easy and comprehensible way in order to help you understand who we are, what Personal Data we collect about you, why we collect it, and what we do with it during our recruitment process.

### Who we are

The Commission for Regulation of Utilities (CRU) is Ireland's independent energy and water regulator and has a wide range of economic, customer protection and safety responsibilities. The CRU acts as data controller in relation to information held about you for the purposes of data protection law i.e. the General Data Protection Regulation (GDPR) and any applicable Irish implementation.

### The information we process about you

Personal Data means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, email address, phone number, etc.

Categories of Personal Data	Examples of types of Personal Data We Collect
<b>Personal details</b>	Name, surname, title, and other information provided in your CV
<b>Contact information data</b>	Email, phone, address
<b>Education and work history</b>	Any information contained in CVs and additional documents containing personal details (including cover letter / application, diplomas, certificates) as provided by applicants relating to educational and employment background including professional qualifications, skills training undertaken and previous employment details.
<b>Assessment</b>	CV, psychometric tests (such as a situational judgement test, ability or personality test), evaluations of interviews conducted with applicants (face to face, telephone or video)
<b>Pre-employment screening</b>	Reference checks, qualifications check, fitness to work confirmation
<b>Other</b>	Health issues requiring adaptations to working environment, compensation requests

### Why we use your information (legal basis)

We fully respect your right to privacy and will only collect or process your personal data for one or more of the following purposes (legal basis):

The personal data you provide in your application and as part of the recruitment process will only be held and processed for the purpose of the selection processes of the CRU and in connection with any subsequent employment.

#### **The necessity to establish a contractual relationship with you**

Personal data is collected to fill vacant positions and for the engagement and payment of employees, as follows:

- To identify and evaluate candidature,
- In assessing skills, qualifications and interest against our career opportunities,
- To set up and conduct interviews and assessments,
- To evaluate, select and recruit applicants,
- To conduct recruitment assessments as required,
- To contact third party references provided by applicants
- To evaluate applicant's previous performances or as otherwise necessary in context of recruitment activities,
- To keep records related to the CRU recruitment process.

#### **The necessity for us to comply with legal obligations**

- Complying with your information rights.
- Complying with the CRU's statutory responsibilities imposed by legislation. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax; social insurance; statutory sick pay; statutory maternity and paternity pay; paternity leave; and equal opportunities monitoring.

#### **Where you have given us permission (which you may withdraw at any time)**

- Using cookies in accordance with our Cookie Policy.
- Using special categories of data, or sensitive data.

When we ask for your consent, we will provide you with more information on how we will use your data in reliance on that consent, including in relation to third parties we would like your consent to share your data with.

#### **To protect your vital interests**

Occasionally it may be necessary for the CRU to process personal data in order to protect a vital interest of an individual.

#### **To run our organisation on a day to day basis including to**

- Compile and process your information for audit, statistical or reporting purposes (including, in some instances, making your data anonymous).
- Protect our business, reputation, resources and equipment and manage the CRU network systems, and information.
- Provide security and prevent and detect crime including using CCTV at our premises.
- Manage and administer our legal and compliance affairs.

The CRU will only process your personal data for the purposes for which they were originally collected and it will only be processed further for the following closely related business purposes:

- transferring the personal data to an archive;

- conducting internal audits or investigations;
- implementing business controls;
- conducting statistical analysis or research as required;
- preparing for or engaging in dispute resolution;
- using legal or business consulting services; or
- managing insurance issues.

'Processing' covers all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.

## Sharing your personal data

We do not share any of your Personal Data except in the limited cases described here.

The CRU will need to share your personal information internally and may require to share it with some external parties. We process this information for a range of purposes relating to recruitment and to enable these processes, your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your personal information may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf;
- Employees in HR who have responsibility for certain HR processes (for example recruitment, assessment, pre-employment screening);
- Employees who are part of the selection and / or interview panel; and
- Employees in the SMT or HR with responsibility for policies and contractual requirements.

In the event of your application resulting in the offer and your acceptance of a position, your personal information will be held in the CRU's staff database and will be shared with the following internal functions:

- Employees in ICT and system owners who manage user access and setup; and
- Facilities personnel for facilities / premises access.

The CRU will also need to share your information with certain external third parties including:

- Companies or individuals who provide recruitment, candidate interview and assessment services;
- Academic institutions (Universities, colleges, etc.) in validating information you've provided;
- Previous employers in validating employment history;
- The Office of the Chief Medical Officer (CMO) <http://cmo.gov.ie/pre-employment-medical-forms/>);
- Service provides providing operational and systems support and maintenance. These include ICT systems services, ICT maintenance, software development, document storage and destruction, printing, couriers, auditors and consultants including legal advisors.

## Processing your information outside the EEA

Your information is stored on secure systems within the CRU premises and with providers of secure information storage. We may transfer or allow the transfer of information about you with us to our service providers and other organisations outside the European Economic Area (EEA), but only if

they agree to act solely on our instructions and protect your information to the same standard that applies in the EEA.

## How long we hold your information

The length of time we hold your data depends on a number of factors such as:

- The type of data we hold about you.
- Whether there is a legal obligation to hold the data for a minimum specified period.
- Whether there is a public interest basis to hold the data for a specified period.
- Where there is a sound evidence-based reason to hold the data for a specified period.

As a general rule, we keep your information for a specified period after the date on which your interaction with us has completed.

Unsuccessful applicant data will be held within the recruitment system for a period of 12 months before being deleted so that we can respond to statutory reporting requests. Successful applicant data resulting in subsequent employment will be retained for 6 years following cessation of employment (excepting service records for pension purposes).

## Exercising your information rights

You have several rights in relation to how we use your information. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise.

You have the right to:

- Find out if we use your information, to access your information and to receive copies of the information we have about you.
- Request that inaccurate information is corrected and incomplete information updated.
- Object to particular uses of your personal data which you believe is causing damage or distress and where the legal basis for our use of your data is the performance of a task in the public interest or our legitimate business interests or. However, doing so may have an impact on the extent of completion of the recruitment process with you. If you wish to object to certain data processing operations, please state set out how the processing is causing you unwarranted and substantial damage and distress.
- Have your data deleted or its use restricted – you have a right to this under certain circumstances. For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.
- Obtain a transferable copy of certain data to which can be transferred to another provider, known as “the right to data portability”. This right applies where personal information is being processed based on consent or for performance of a contract and the processing is carried out by automated means. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access. The right also permits the transfer of data directly to another provider where technically feasible. Therefore, depending on the technology involved, we may not be able to receive personal data transferred to us and we will not be responsible for the accuracy of same.
- Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

To facilitate your request, when contacting us, please specify the reasons why the personal data are incorrect, incomplete or not lawfully processed. Please note that in certain circumstances the CRU may not be able to fulfil your request as we may be legally required to keep such data.

We are obliged to respond without undue delay. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons why. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise. In order to respond in writing, please provide us with your full name and home address (including your Eircode).

You can assist us in responding to your request by including any additional details that would help to locate your information – such as; the type of personal data involved, your customer account or reference number or the circumstances in which the CRU obtained your personal data. The CRU has templates available which may be issued to you to assist in responding to your request. You may also be asked for evidence of your identity to make sure that personal information is not given to the wrong person.

**You have the right to complain to the Data Protection Commission or another supervisory authority.**

You can contact the Data Protection Commission at  
<https://www.dataprotection.ie/docs/Contact-us/b/11.html>

**Telephone:** +353 (0)761 104 800 or Lo Call Number 1890 252 231  
**Fax:** +353 57 868 4757  
**E-mail:** [info@dataprotection.ie](mailto:info@dataprotection.ie)  
**Postal Address:** Data Protection Commission, Canal House, Station Road,  
Portarlinton, Co. Laois R32 AP23 or 21 Fitzwilliam Square  
Dublin 2, D02 RD28

## How to contact us and our Data Protection Officer

If you have any questions about this notice or your personal information in the CRU generally, including questions about accessing your personal information or correcting it, please contact our Data Protection Officer at

**Online:** <https://www.cru.ie/home/about-cru/privacy/>  
**Telephone:** +353 (0)1 4000800  
**E-mail:** [dataprotection@cru.ie](mailto:dataprotection@cru.ie)  
**Postal Address:** The CRU, Grain House, The Exchange, Tallaght, Dublin  
24, D24 PXW0, Ireland

## Changes to this notice

We will update this Privacy Notice from time to time. Any changes will be communicated to you and made available on this page and, where appropriate, notified to you by e-mail or when you contact the CRU again.