

TribePad Customer GDPR Readiness

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Introduction

By now you will no doubt have heard of GDPR (the General Data Protection Regulations), a European law coming into force on May 25th, 2018.

As I have mentioned before in my webinars, if you are currently compliant with current Data Protection Act regulations, then you won't be a million miles away from being GDPR compliant. The key concerns you need to focus your attention on are:

- explicitly gaining opt ins from candidates;
- ensuring you have full transparency in your privacy policy: what, who and where has access to data.

Other areas of GDPR are largely covered in current regulations, including:

- allowing candidates to edit and correct their details;
- allowing candidates to have their details deleted.

To help customers ensure that they are adequately compliant with GDPR, TribePad are making available a number of features and capabilities.

Opt-ins

It used to be legally (if not ethically) acceptable to auto opt-in users to things and make the users explicitly opt out of certain things if they didn't want them.

A candidate really needs to volunteer a certain amount of information about themselves if they want to apply for a job or register on your talent pool, however they do need to explicitly opt in to your privacy policy and terms and conditions as a minimum.

As such, TribePad will allow you to force a candidate to tick the opt-ins to agree to your terms and policy before they register their details.

Options for new users to register with

matt

jones

mattjones@yopmail.com

.....

I have read and agree to the Terms and Conditions

I have read and agree to the Privacy Policy

I agree. Create my account

Additionally, TribePad allows recruiters to engage with candidates in ways that some of their candidates may not want, or may want to change their preferences for. Therefore, we will also allow you to let candidates opt in to other preferences, including:

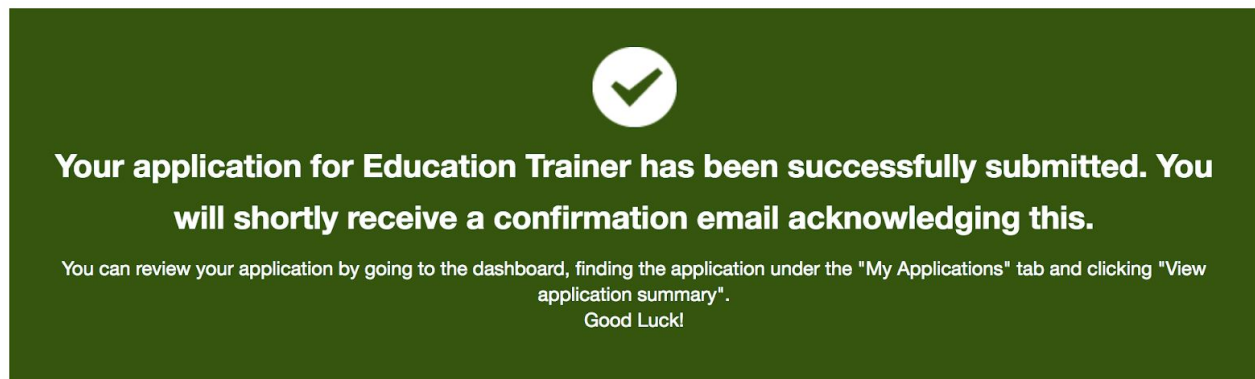
1. opt in/out of automated matching emails;
2. opt in/out of recruiters inviting candidates to apply for other jobs;
3. opt in/out of recruiters contacting them about news about the company but not specifically about a job;
4. opt in/out of job specific SMSs;
5. opt in/out of ad-hoc SMSs.

That sounds like a lot of opt-ins, but don't worry you don't have to show them all. Only the ones that are relevant to your process - for example, if you don't use SMS then don't enable the SMS ones.

You can also choose to combine some of the opt ins rather than make them individually explicit - but be very careful if you choose to do this as you need to make sure it is legally acceptable (see the section on PECR, below, for further possible allowances). You could, for example, not have matching emails turned on your instance of TribePad, in which case, you can disable that opt-in.

You may also consider combining option 2 and 3 above. In which case, make one of them invisible and opted-in, and you can even reword the opt-in (as long as it is still in context). The candidate will still be able to explicitly opt-out / in of individual items on their settings page. Again, though, be cautious when using soft opt-ins, and always seek advice first.

After a candidate registers, they will be prompted to select their preferences. Again, don't be overwhelmed by the number of opt-ins. You will only have ones on that are relevant to you.



Update your opt-in settings

Please note: These settings can be updated on the settings page of your account

- Check all
- I want to be automatically alerted when jobs are posted that I might be interested in (recommended)
- I want to be suggested to recruiters for other jobs that I might be suitable for (recommended)
- I want recruiters to contact me about other suitable opportunities (recommended)
- I want recruiters to contact me about other company news and events
- I want to be kept informed of my application progress by SMS
- I want to be informed of other company news by SMS

Save

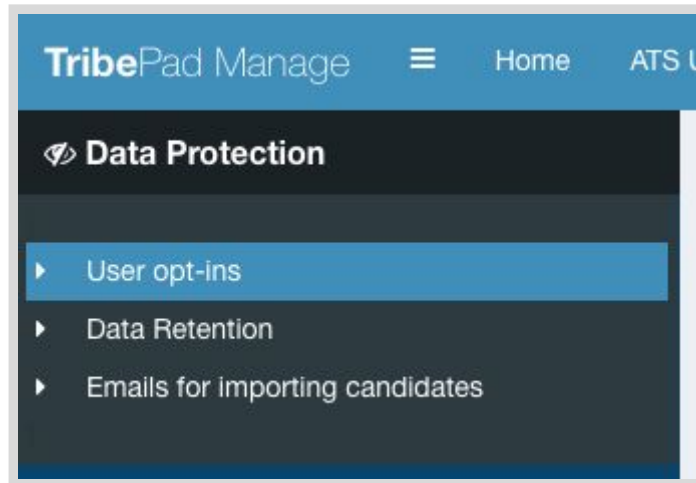
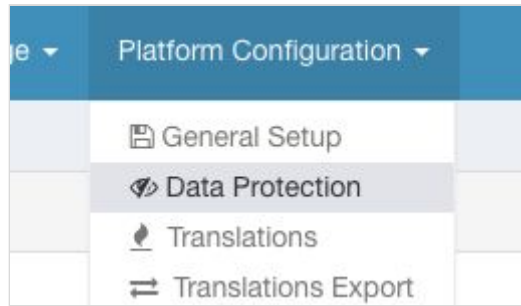
Candidates will be able to opt in and out of these after they have completed their registration and also at any time by going to their Settings page:

Opt-in and communication settings

- I want to be automatically alerted when jobs are posted that I might be interested in (recommended)
- I want to be suggested to recruiters for other jobs that I might be suitable for (recommended)
- I want recruiters to contact me about other suitable opportunities (recommended)
- I want recruiters to contact me about other company news and events
- I want to be kept informed of my application progress by SMS
- I want to be informed of other company news by SMS

You can manage all of your opt ins - which ones you want to enable and which ones you want to default on/off – in the “Manage” tool.

Simply go to the Data Protection menu item under Platform Configuration:



Usage terms for the candidate Add custom				
	Ask prior to registration	Ask on sign up completion	Must agree to	Display on candidates settings
Terms and Conditions <i>'I have read and agree to the Terms & Conditions'</i> Edit text	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Privacy Policy <i>'I have read and agree to the Privacy Policy'</i> Edit text	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Cookie Policy <i>'I have read and agree to the Cookie Policy'</i> Edit text	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Opt-in permissions for the candidate Add custom				
	Ask on sign up completion	Checked by default ⁱ	Recommended to candidates	Display on candidates settings
Job Matching <i>'I want to be automatically alerted when jobs are posted that I might be interested in'</i> Edit text	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Suggest profile to recruiters <i>'I want to be suggested to recruiters for other jobs that I might be suitable for'</i> Edit text	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Recruiter to contact for other opportunities <i>'I want recruiters to contact me about other suitable opportunities'</i> Edit text	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recruiter to contact for general updates <i>'I want recruiters to contact me about other company news and events'</i> Edit text	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
SMS application updates <i>'I want to be kept informed of my application progress by SMS'</i> Edit text	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This module also lets you add your own custom Opt ins if your company needs to add more specific ones. Ask your service delivery manager if you think you need to do this.

Tick the opt ins you want to enable but **BE SURE THAT YOUR SETTINGS ARE ADEQUATE IN RELATION TO YOUR PRIVACY POLICY.** You should not disable the opt in of ts and cs / privacy policy unless you have had written legal permission to do so.

With the standing of other regulations such as PECR (see below) still unclear, it is still feasible that you can soft opt-in some settings for relevant communication – e.g. for a recruiter to send details of other jobs that are very similar to other jobs the candidate has applied to. Be very cautious when soft-opting in candidates as the law is not 100% clear and the safest thing to do is ask the candidates.

If you did want to soft-opt in candidates to some things then make sure it is clear in your privacy policy that candidates will be signing up to certain communication or processing. To enable a soft-opt in, simply change the opt in to default to On. You can also hide the opt in altogether if it is mentioned in the privacy policy. However as stated, use this setting with complete caution. TribePad will not accept responsibility for your interpretation of GDPR, or what is legal in your country. Please make sure you have had your implementation reviewed by a suitably qualified legal representative for your organisation.

Deleting and anonymising candidates

As long as you are clear in your candidate privacy policy on how they can delete their details then you will be covered. You do not need an automated process – it could be an email address or telephone number you give the candidates to contact to request deletion, as long as you are clear what the process is. Make sure to be clear in your privacy policy.

TribePad will offer you a feature to allow candidates to delete (or archive) their own profile, but you do not have to have this turned on if you do not want to. Just ask your service delivery manager to turn the feature on if you want it. The advantage of turning this feature on is that you will minimise the requests coming to your organisation, but the disadvantage is that you are not in control of who gets deleted. The safest thing to do, however, is to have the feature turned on.

TribePad will also be allowing your admins to delete / archive candidate data using the Manage tool. This means you will not need to raise a ticket as you currently do to remove a candidate.

To support the removal of candidate profiles, TribePad can delete or anonymise the candidate data. The benefit of anonymising data is that you can keep a record that someone applied for a job even if you don't know who it was. This means your reporting numbers will not be affected and won't mysteriously jump up and down without a trace of why.

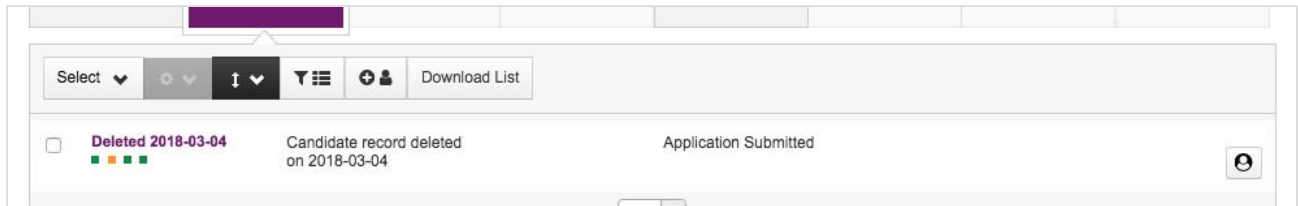
If you choose to delete data then the record will not appear in the ATS or reports and it will be as if an application did not happen. This is by far the cleanest approach.

If you choose to anonymise the data then the ATS and the associated reports will still show that someone applied for a job but it won't necessarily give you much information about that application.

You will be able to set your data deletion and anonymising rules using the Data Protection module in the Manage tool. You will be able to specify whether you want to delete records or anonymise them. You can specify different rules for different countries and you can specify different rules for internal candidates. This means you can keep some data about

internal candidates whilst deleting the same data for external candidates. These features are useful for countries like Northern Ireland, where there are certain legal community reporting requirements

If you elect to anonymise data then the candidates name will appear as “deleted yyyy-mm-dd” and other text data will appear as “Candidate record deleted on yyyy-mm-dd”

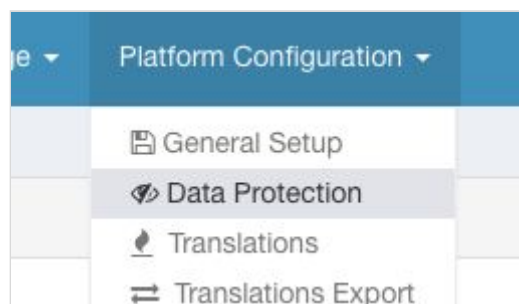


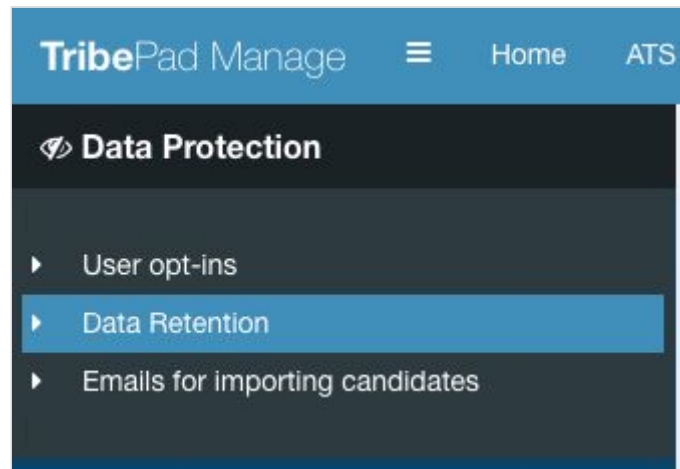
However, if you choose the anonymise feature then you can also keep some data “unanonymised” whilst keeping other data about the candidate anonymised. Therefore, if you wished then you could, for example, see the candidate name whilst anonymising everything else. The benefit of this is you don’t see a trail of “deleted” messages in your list and, more importantly, if a deleted candidate did contact you in the future, you will know what job they applied, even if you know nothing else about them.

You may wish to consider the anonymise option very carefully as you still need to protect yourself from disputes. The worst thing you could do is delete everything about a candidate and then later receive a complaint from that candidate, and you not have any data to prove or disprove any accusations.

Whilst it is legally cleaner to delete all data, you may want to balance that with having enough data to protect your organisation. You need to be very careful not to keep personally identifying data though, but if you are keeping a name and no contact details, location details or current company details then you are closer to fulfilling the deletion obligation.

To specify what rules you want – delete or anonymise, then go to the Data Protection module in Manage and select the Data Retention option.





You will see a section for Deleting and Anonymising settings.

Here you should configure your default settings – ones that will apply to every country unless you create a different rule for that country.

Select whether you want to anonymise data or delete records.

Delete or Anonymise candidate accounts
By default no candidate data will be retained on deletion unless specified below.

Internal	External																																																																																																				
<input checked="" type="radio"/>	<input checked="" type="radio"/>	<p>Completely delete the candidate and their data Deleted candidates will not appear in any of your reports or applicant lists.</p>																																																																																																			
<input type="radio"/>	<input type="radio"/>	<p>Anonymise the candidate Anonymised candidates will continue to appear in your reports and applicant lists. Unless you tick some fields below, their data will be completely anonymised.</p> <table border="1"> <thead> <tr> <th></th> <th>Internal</th> <th>External</th> <th></th> <th>Internal</th> <th>External</th> <th></th> <th>Internal</th> <th>External</th> </tr> </thead> <tbody> <tr> <td>All fields</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Education history</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Application records</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Name</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Dates (to and from)</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Application documents</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Address</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Institution</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Application questionnaires</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Contact number</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Qualifications</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Career history</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Diversity data</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Details</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Job title</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Portfolio</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Career history</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Company</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Documents</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Job title</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Dates (to and from)</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Cv uploads</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Company</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Details</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Candidate notes</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Dates (to and from)</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>Details</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Internal	External		Internal	External		Internal	External	All fields	<input type="checkbox"/>	<input type="checkbox"/>	Education history	<input type="checkbox"/>	<input type="checkbox"/>	Application records	<input type="checkbox"/>	<input type="checkbox"/>	Name	<input type="checkbox"/>	<input type="checkbox"/>	Dates (to and from)	<input type="checkbox"/>	<input type="checkbox"/>	Application documents	<input type="checkbox"/>	<input type="checkbox"/>	Address	<input type="checkbox"/>	<input type="checkbox"/>	Institution	<input type="checkbox"/>	<input type="checkbox"/>	Application questionnaires	<input type="checkbox"/>	<input type="checkbox"/>	Contact number	<input type="checkbox"/>	<input type="checkbox"/>	Qualifications	<input type="checkbox"/>	<input type="checkbox"/>	Career history	<input type="checkbox"/>	<input type="checkbox"/>	Diversity data	<input type="checkbox"/>	<input type="checkbox"/>	Details	<input type="checkbox"/>	<input type="checkbox"/>	Job title	<input type="checkbox"/>	<input type="checkbox"/>	Portfolio	<input type="checkbox"/>	<input type="checkbox"/>	Career history	<input type="checkbox"/>	<input type="checkbox"/>	Company	<input type="checkbox"/>	<input type="checkbox"/>	Documents	<input type="checkbox"/>	<input type="checkbox"/>	Job title	<input type="checkbox"/>	<input type="checkbox"/>	Dates (to and from)	<input type="checkbox"/>	<input type="checkbox"/>	Cv uploads	<input type="checkbox"/>	<input type="checkbox"/>	Company	<input type="checkbox"/>	<input type="checkbox"/>	Details	<input type="checkbox"/>	<input type="checkbox"/>	Candidate notes	<input type="checkbox"/>	<input type="checkbox"/>	Dates (to and from)	<input type="checkbox"/>	<input type="checkbox"/>							Details	<input type="checkbox"/>	<input type="checkbox"/>			
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Here you can also choose fields that you do not want to anonymise. Note that you can select different settings for internal candidates, allowing you to keep more data about your staff.

Once you have set your default rule set up for internal and external candidates, you may want to specify a different rule for specific countries. Just scroll down and type the country here:

Custom settings by location

Override the defaults above by creating custom location settings by selecting countries (or group of countries) from the list below.

Edit

You have custom settings for the following:

UK
Republic Ireland
Edit

This is where you could specify a different rule for Northern Ireland, or maybe a country outside the EU, for example.

Automatically deleting / anonymising your records

Once you have set up what you will do when deleting and anonymising your candidate data, you can then set up whether you want to auto delete/anonymise data for inactive candidates. This will be driven by your data retention policy. How long do you want to keep your candidate records for?

TribePad's data retention module allows you to auto delete/anonymise data automatically if a candidate has not logged in for a long period of time. A typical approach would be to delete candidate records if they have not logged in to your system for 12 months, however this can be 24 months, 36 months, 6 months or any period you wish. You must not keep data for longer than you can prove a need for it though, so consider this setting carefully.

Three warning emails need to be configured to send to candidates.

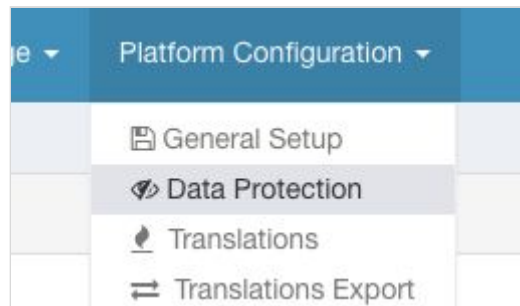
We recommend the first email is more a warm up email that informs the candidate that they haven't logged in for a while and that although you still would love to store their details so they can easily apply for, or be kept informed about future opportunities, you will need to delete their details if they do not log in within the next X days.

The second email we recommend is a gentle reminder about the first warning, and then the third email we recommend be sent the day before the deletion is due to inform that if they fail to login today then their details will be deleted tomorrow.

There is one more email that we will send on the day the candidate is deleted - after their details are deleted to confirm to the candidate that they will need to register again if they want to apply for future opportunities.

So there are 4 emails you can configure and a couple of time periods -how many days after they last logged in should a warning be sent, and how many days for the second warning to be sent.

You can set up these warning emails and the periods in-between these warnings by going to the Data Retention section in the Data Protection module of Manage:



Idle account deletion

Automatically remove profiles from the ATS after being idle for a set period of time. Email warnings are sent to the candidate at each stage of the process allowing them to keep their account active.

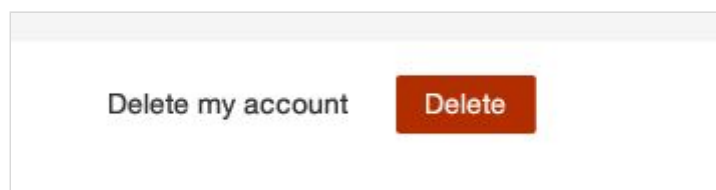
Enable Idle account deletion

Deletion step	Internal	External
1 - Account Idle warning	No. of days <input type="text"/> days Edit email	No. of days <input type="text"/> days Edit email
2 - Account Idle follow up - your account will be removed	No. of days <input type="text"/> days after first warning Edit email	No. of days <input type="text"/> days after first warning Edit email
3 - 1 day until the account is removed warning	Edit email	Edit email
4 - Account removal confirmation	Edit email	Edit email
5 - Delete the data so that it is no longer reportable or retrievable, including previously anonymised data OR Anonymise the data according to the anonymisation rules you have set for a candidate's country	<input type="radio"/>	<input type="radio"/>

If you turn on this feature you have the option to delete all inactive candidates records. You do not have to delete previously anonymised records but you do have the option to. So, for example, if you have anonymisation switched on (for preserving reporting), and a candidate deletes their data or a recruiter manually deletes it, then their data will stay anonymised either forever, or it could be deleted as part of your data retention policy. We recommend you choose to delete previously anonymised data but understand you may wish to preserve you reporting for several years.

Candidates deleting their own profile

A candidate will be able to delete their account by going to their settings page.



As a safety precaution candidates will be requested to enter their password again. Once they have done this they will receive an email confirming that they have requested to delete their account. The mail can also let the candidate cancel their request within a certain number of days. The number of days grace period will be up to you.

You can set the grace period and then email a candidate receives using the Manage tool again. Just go to the Data Protection module and enter the grace period and the email here:

Grace period before account deletion following a candidates request
The grace period allows the user time to change their mind following the request. They can do this via the confirmation email or via the setting page of their account

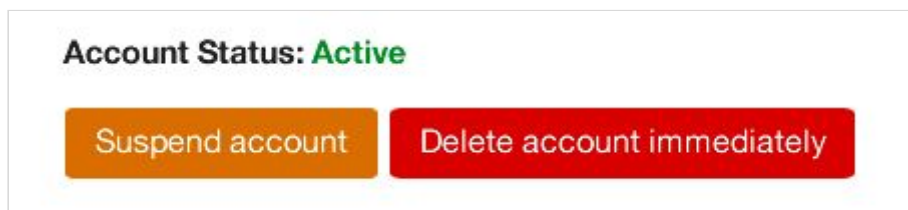
Days grace period
 [Edit email](#)

Final account delation warning email
The system will send the user a final warning that their account will be deleted.

Days prior to deletion
 [Edit email](#)

Admins deleting candidate records

An admin can delete a candidate in the same place they can currently suspend users in Manage. Simply search for the candidate and look for the Delete Candidate button.



Privacy policy

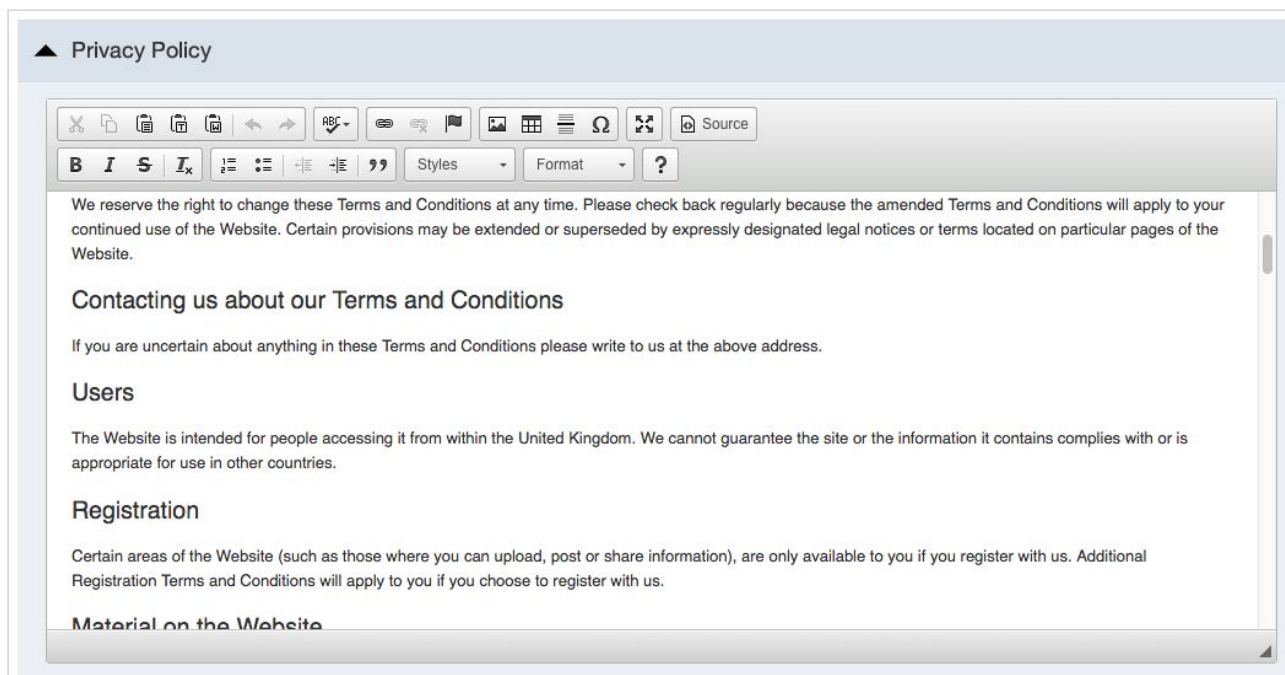
Along with opt-ins, the privacy policy is the most important element of GDPR to get right.

You need to be clear with candidates on the following:

- what data you are going to collect
- why you are going to collect it
- how long you are going to keep it
- who is going to have access to their data
- what countries will their data be available in – do you have an offshore support function?
- who you are going to share the data with
- how they will be able to edit their data
- how they will be able to delete their data
- what automated processing you are going to do with their data and what automated decision making you will do using their data

Consider having separate headings for each of these sections.

To edit your privacy policy, go into the Data Protection section in Manage and scroll down to the Privacy Policy section:



Just make any change there and save them for your candidates to see.

Terms and conditions

Your terms and conditions are probably ok as they are now as long as your privacy policy covers all the necessary areas of GDPR, however it is recommended that you take the time to review them now while you review your privacy policy.

As with the privacy policy there is a quick way in Manage to edit your candidate terms. They can be set just below where you edited your privacy policy in Manage (see above).

What if I change my terms and privacy policy again?

We will offer you the ability to make sure your existing candidates accept your new terms and conditions the next time they login. They will see a screenshot similar to below when they next login.

Changes to your account

Due to the recent changes to the 'General Data Protection Regulation'...

Before you continue you need to agree to our terms and privacy policy

- I have read and agree to the Terms and Conditions [View the policy](#)
- I have read and agree to the Privacy Policy [View the policy](#)
- I have read and agree to the Cookie Policy [View the policy](#)

Update your opt-in settings

Please note: These settings can be updates on the settings page of your account

- Check all**
- I want to be automatically alerted when jobs are posted that I might be interested in ([recommended](#))
- I want to be suggested to recruiters for other jobs that I might be suitable for ([recommended](#))
- I want recruiters to contact me about other suitable opportunities ([recommended](#))
- I want recruiters to contact me about other company news and events
- I want to be kept informed of my application progress by SMS
- I want to be informed of other company news by SMS

[Update and Continue](#)

Terms for recruiters

When a recruiter logs in for the first time you may want them to accept your company access terms and conditions. This will be possible by editing their terms in the Manage tool:

Recruiters Terms and Conditions

Recruiter Terms and Conditions placeholder

body p

If you have recruiter terms set up, when a recruiter logs in they will not be able to get anywhere until they have acknowledged and accepted your recruiter license terms and conditions:

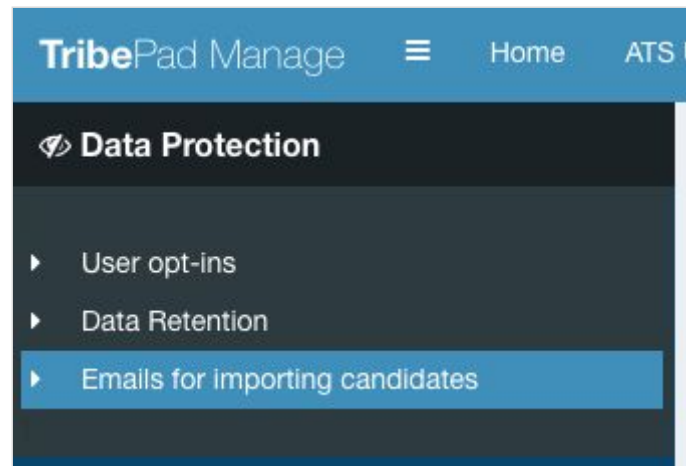
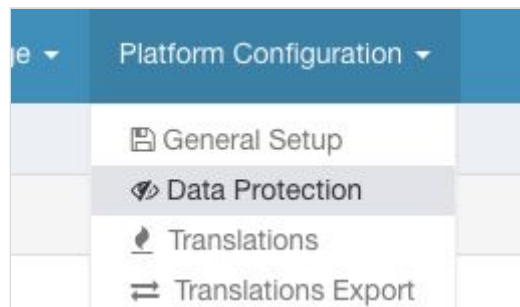
Before you continue you must accept our user terms.

<your terms go here>

I have read and accept the terms of use.

[Continue](#)

Candidates added by someone else



Email Name	
Emails for importing candidates	
<input checked="" type="checkbox"/> Passive candidate creation	EDIT
<input checked="" type="checkbox"/> Agency candidate upload	EDIT
<input checked="" type="checkbox"/> Broadbean import	EDIT

Agency candidates

Agencies can currently upload candidates to TribePad but there is no way of knowing if the candidate gave their consent. Some agencies have been known to speculatively upload candidate details without consulting the candidate first. Candidates do receive an email notifying them that they have been uploaded, and your privacy policy process will notify the candidate how to delete their details, but as part of the GDPR programme, we will allow candidates to report this and have a link in their email requesting their details to be deleted.

You will be able to edit the email that goes to your candidates when an agency adds them to a job in the Manage tool, in the Data Retention section of the Data Protection module.

Default
✕

Agency candidate create, ATS

Subject

{\$project_name} : Account creation

Content

Supported tags: - Click on each tag to add into the email content

+ {\$name_first}
+ {\$project_name}
+ {\$username}
+ {\$password}
+ %%company_name%%

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Dear {\$name_first},

Your {\$project_name} community account has been created by %%company_name%%.

Please read our [terms and conditions](#) and [privacy policy](#). If you do not agree to these terms, you can [request for your account to be closed](#).

Your username is: {\$username}

Your password is: {\$password}

body p

Passive candidates

Similar to agencies uploading candidates, recruiters can also add “passive candidates” to the system. Again, these candidates have not definitely consented to this. Therefore, candidates will be given the option to delete their account or confirm that they are happy to be on the system. You can configure this email in the same way as above with agencies.

Default ✕

Passive candidate create, ATS

Subject

{ \$project_name } : Account Details

Content

Supported tags: - Click on each tag to add into the email content

+ { \$name_first } + { \$project_name } + { \$username } + { \$password } + %%company_name%%

Dear { \$name_first },

Your { \$project_name } community account has been created.

Your username is: { \$username }

Your password is: { \$password }

You can log in at { \$label_url }

Importing via Broadbean or LinkedIn/Similar

Passive candidates don't just have to be created directly by a recruiter in TribePad, they could have used our Broadbean integration for searching candidates across job boards and importing candidates directly from a job board.

The same process will be available for candidates created in this way. If you have the broadbean talent search module then you will see the option to edit the candidate import notification email in Manage next to the passive candidate email.

At the time of writing we do not currently support linkedin imports from recruiters, but we are planning to add this support in the near future for recruiters with linkedin licenses.

Default ✕

Passive candidate create via LinkedIn

Subject

{ \$project_name } : Account Creation via LinkedIn

Content

Supported tags: - Click on each tag to add into the email content

+ { \$name_first } + { \$project_name } + { \$username } + { \$password } + %%company_name%%

Dear { \$name_first },

Your { \$project_name } community account has been created by %%company_name%% via your profile on LinkedIn. You can now apply for our positions directly.

Please read our [terms and conditions](#) and [privacy policy](#). If you do not agree to these terms you can [request for your account to be deleted](#).

Your username is: { \$username }

body p

Third parties that you are integrated with

Some of our customers have integrations with other third parties, including TalentQ, SHL, Chemistry Group, Onfido, Basis Media and others.

This means your candidate data may be passing through TribePad and into one of your third party's systems. So what happens if a candidate asks to have their details removed? You need some way of managing the deletion of data that has passed to third parties.

While TribePad does not have an automated way of deleting from third party systems, we can help you with the process by sending an email to a designated address for that third party. The email can contain some details of what we know the third party might have about the candidate – for example, name and “transaction id”. This kind of information would help them track down a candidate and delete their data from the third party. It is up to you to decide what email address the emails go to – it could be the third party or your own company. However, TribePad cannot be held responsible for data held in your third party databases so you will need to ensure that your process includes your third parties.

To set up the email and email address you can go to the Data Retention section of the Data protection module within Manage. Then look for the Third Party notification section and enter the email address and corresponding email content.

Third party email addresses for account deletion notification

You can set the content of each email in the account deletion process in our [Email Management System](#).

SHL	<input type="text" value="email@shl.com"/>	Edit candidate message
Talent Q	<input type="text" value="email@talentq.com"/>	Edit candidate message

Note that this feature will be available from the end of May.

You will also be able to edit the message a candidate sees before their data is transferred to a third party, such as SHL or TalentQ during the application process.

Step 3: External Assessment

External assessment

As part of your application we would like you to complete an external assessment

Click the "Continue to assessment" button below and then follow the instructions shown. When you have finished the online assessment you will be returned back here, where you can submit your application. Good luck!

Please note - To complete the assessment we will need to pass your details to the third party. If you do not want this to happen, please click the button to cancel your application.

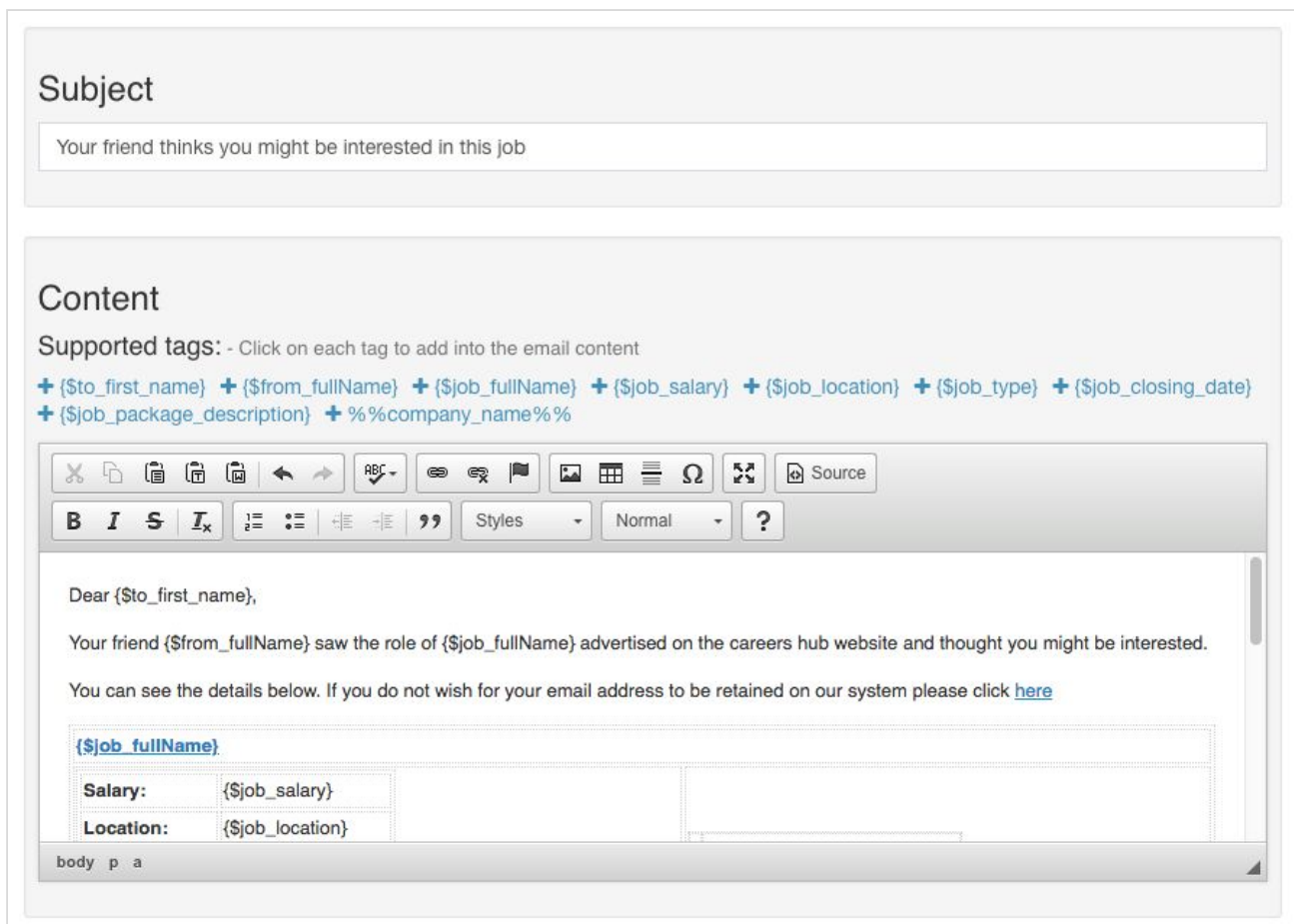
Cancel my application

Continue to assessment

You just need to click on the "Edit candidate message" button against the relevant third party - see screenshot above.

What about referrals?

If a user refers a friend or associate to a job then TribePad may store that referee's email address (in order to send the email and track the referral). The email address wasn't volunteered by the referee but was provided by the referrer. We will allow referred candidates who are not users of TribePad to delete their email address from our system. You may need to edit the content of your referral email to enable this feature. You will be able to do this in your Manage system in the Data Retention section of the Data Protection module.



What about PECR?

With new regulations you are always going to be kept on your toes! PECR (Personal Electronic Communication Regulation) is a pre-existing regulation that was believed to be made obsolete with the adoption of GDPR. However, it has recently been confirmed by the ICO for the UK at least that PECR will not be replaced immediately following GDPR. It is still believed that it will be at some point be made obsolete but while it is not obsolete, there is a potential window where you may be able to benefit from the PECR.

This relates to what is acceptable to communicate electronically to your users – with an opt in or even with a “soft opt” in. The example they use in this article [<link>](#) is a charity where someone has made a donation to them. The donor gave their email address during the donation. In the example, PECR makes allowances for the charity to send other emails about the charity to the donor, even though the donor did not explicitly opt-in to this kind of email. This is allowed in this context because the donor has expressed an interest in the charity and the charity has [reasonably] inferred that the donor will also be interested in learning more about the charity. This is a “soft opt-in”. This is deemed acceptable in the example as long as the charity makes it easy and obvious for the user to opt-out of future emails.

The fact the example was a charity, and it has not clarified the extent to which “reasonably infer” is acceptable, means that the use of PECR against GDPR should be considered with

caution. Only consider this approach of soft opt-ins if your legal team have given you written assurances.

Notwithstanding, TribePad will allow you to soft opt-in, and will allow candidates to change their preferences in their Settings page.

One-off email to your existing talent pool

Depending on your existing privacy policy and terms that your candidates signed up to, you may need to send a one-off email to all of your existing candidates asking them to re-opt-in to your terms, and giving them the option to remove their account if need be. Due to the system performance and the cost implications of emailing an entire candidate base, we will be offering this as a project managed option for customers. Please note that there may be costs involved in doing this, but if you are interested in doing this then please contact your service delivery manager as soon as possible to arrange this.

Timescales

The most important parts of GDPR are getting your opt ins sorted, your privacy policy and your candidate deletion process right. These will all be available for you to configure in the Manage tool by the end of April. You will also be able to send a one-off email to your existing base with these features enabled from end of April also, however as mentioned above, this could result in a cost. For customers with a huge talent pool, sending these emails may take days or even a couple of weeks, so please start your planning now.

The Passive / agency candidate process, automated data retention policy will be available to configure in early May but will not run for the first time until beginning of June, and will continue running in perpetuity.

The referred candidate process will be available by May 25th.

FAQs

#	Question	Answer
1	My company is in the UK and we're leaving the EU, so this GDPR thing doesn't include me, does it?	Incorrect. The UK is adopting GDPR in full, and is also extending it, so compliance is a must.
2	My company isn't based in Europe, so I don't need to worry about this, right?	Incorrect. Every organisation around the world needs to comply with GDPR if they are going to process and/or store data about European citizens.
3	Do you encrypt data in transit?	Yes, absolutely!
4	Do you encrypt data at rest?	We encrypt candidate name by default. We can also encrypt address, telephone number and

		email address if required but there may be extra costs involved in this service, and may impact the speed of your platform. We are more than happy to enable it for customers on request though.
5	What kind of data is considered sensitive and personal?	Anything that can be used to identify an individual on its own or in combination. So this could be email address, the person's address or telephone number in
6	Where do you store the data?	In the UK in our two data centres.
7	Can I have different data retention rules for internal candidates?	Yes. You can keep internal candidate data for longer and you can anonymise rather than delete internal candidate data. You can have different settings for internal candidates and external candidates.
8	Can I have different data retention rules for different countries?	Yes.
9	Do I have to let candidates delete their own profile?	<p>If a candidate wants their details removed then you have to provide a way for this to happen. You don't specifically need to let the candidate delete their own profile, however you do need to let them know how they can have their details removed. This would be in your privacy policy.</p> <p>Although not specifically required, TribePad will offer the ability for candidates to delete their own profiles without intervention from you. You do not have to have this feature turned on as long as you give your candidates a way to request their details to be removed. We believe that providing the button will save you time. We are also allowing your super users to delete candidate records using the Manage tool - meaning you will no longer need to raise a ticket to us.</p>
10	I want to add passive candidates but don't want them to know. Is this ok?	Probably not ok but it depends. If you are storing information that identifies the candidate then they have the right to know this, but if you are only storing a link to a linkedin profile and maybe the person's name, then this is probably ok because the candidate has the ability to edit their linkedin profile. If you create a passive candidate and specify their email address, we will notify them and give them access to their profile though.

		Users that you allow to create passive candidates should be versed in GDPR to ensure they are within the guidelines.
11	I only want to store linkedin links, can't I do that?	Yes, but you'll probably need their name as well. If you store their email address we will let the candidate know about it.
12	Can I add my own opt-ins for my candidates if I intend to do something outside of TribePad?	Yes, we allow you to add your own bespoke opt-ins. Have a word with your account manager for details.
13	What about my existing candidates - do I have to get rid of them?	<p>This is the billion dollar question. The answer to this question is probably no, though.</p> <p>A lot of this will depend on your existing terms and conditions and privacy policy that your candidates signed up to before GDPR.</p> <p>The more of the following that is true, the more clear you are:</p> <ul style="list-style-type: none"> - If your pre-GDPR terms were clear that users were signing up to the different kinds of communication then you are likely clear. - If you are not communicating with them unless they are applying for a job, and only communicating to them about that job, then you are also most likely clear. - If you are not keeping their data for longer than you have a proven need for then you are also most likely clear. <p>However, in all circumstances you should speak to your legal representative.</p> <p>If you are changing your terms and privacy policy quite significantly with new data processing and/or communication processes then you should get your candidates to opt-in to these asap preferably before May 25th. We can project manage a one-off email to your candidate database if you wish to get them to agree to your new terms / opt-ins - but please note that there may be costs associated with this. Please speak to your account manager if you are interested in this option.</p> <p>But, don't panic and don't go deleting your existing candidate base right away. You are likely safe to keep it to a large degree. Just don't over</p>

		<p>communicate to your existing base if they haven't previously opted-in, and only keep candidate data for as long as you have a proven need.</p> <p>I have heard of companies that have deleted their existing candidate base to be 100% safe. But this is very much a considered choice based on what your legal team say, and how transparent your existing terms / privacy policies were.</p>
14	Can my system administrators delete candidate records without having to raise a TribePad ticket?	Yes, you'll have access to do this within the Manage tool.
15	I have to keep data for Northern Ireland regulations. What can I do?	You will be able to set retention policies and data anonymization rules differently for different countries.
16	What if a candidate record needs deleting and TribePad has passed on that candidate's details to a third party - such as SHL/TalentQ/Onfido etc?	If we are integrated with the service and we know that the candidate has had their details sent over to your third party, then we can automatically send an email to an address of your choosing to let someone know that the candidate details need deleting from there too.
17	Is there standard text that you provide for our GDPR compliant privacy policy?	No. This is a legal document between you and your candidates and every customer will have different interpretations of what they need and should do. Therefore, the document will need to be owned and created by each customer.
18	What are the penalties for non-compliance?	They are big! Up to 20 million euros or 4% of your global revenue. It's not worth the risk of not being compliant.
19	Do I need to seek legal advice?	Yes. We recommend all customers speak to their own legal representatives to review your internal processes.

We will also be updating our GDPR FAQ page at <https://support.tribepad.com/manual/gdpr>, so keep an eye out.