



**The Aviator (Farnborough) Limited
Candidate (Job Applicant) Privacy Notice**

Document Control

OWNER	Madhu Murtala, Director of Finance
APPROVER	Magdalena Gora, General Manager
CLASSIFICATION	Public
DATE OF ISSUE	30th March 2026
ISSUE	V 2.0
REASON FOR ISSUE/UPDATE	Updated due to Data (Use and Access) Act
LAST REVIEW/UPDATE	30 th March 2026
NEXT REVIEW	29 th March 2027
DISTRIBUTION	Website - Public

VERSION	AUTHOR	SUMMARY OF CHANGES	DATE
1.0	Evalian Limited	First version	8 th May 2025
1.7	Evalian Limited	Updated to insert complaints process	8 th March 2026
1.8	Evalian Limited	Minor amendments	18 th March 2026
1.9	Evalian Limited	Further minor amendments	18 th March 2026
2.0	Evalian Limited	Further minor amendments	30 th March 2026

Document Release:

This document remains the property of the Aviator (Farnborough) Limited. Release to regulatory authorities is permitted as required.

Contents

Who we are	4
Who this privacy notice applies to and the purpose of this document	4
Data controller	4
What personal data is	4
Personal data we process	5
References.....	5
Equality Act 2010	5
How we collect your personal data	5
How we use your personal data and our lawful bases	5
How we make decisions	8
If you fail to provide personal data	8
Automated decision-making	8
Who we share your personal data with.....	8
International transfers	9
How long we keep your personal data.....	9
Your information rights.....	9
How to exercise your rights	10
Our EU representative.....	10
Complaints	11
How to contact us and our Data Protection Officer.....	11
Changes to this privacy notice	11

Candidate Privacy Notice – Aviator Hotel (Farnborough) Limited

Who we are

We are Aviator Hotel (Farnborough) Limited, an independent hotel for elite travellers moving between London and the world's leading destinations. We are a company registered in England and Wales under company registration number 05812669, with our registered office at 3 Bunhill Row, London, England, EC1Y 8YZ.

Who this privacy notice applies to and the purpose of this document

This privacy notice applies to you if you apply for a job with us. It describes the types of personal data we collect about you, how we use this information, with whom we share it and how long we keep it. This privacy notice also explains your information rights, so please read it carefully. If you have any questions or you wish to make a complaint, you can contact us using the information provided below under the 'Contact Us' section.

Data controller

Aviator Hotel (Farnborough) Limited is a "data controller." This means that we are responsible for deciding how we hold and use personal data about you.

What personal data is

'Personal data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special category personal data' is more sensitive personal data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

Personal data we process

When you apply for a position with us or submit your CV (or similar employment information) to us, whether directly or through an agency, or attend an interview in person or by remote means, we will process your personal data. For further details on the type of personal data we collect and how we use it, please see the table below in the section entitled 'Purposes and lawful bases'.

References

Please note, when we receive references, we do so on a confidential basis. As a result, we would never provide you with a copy of your reference from a referee.

Equality Act 2010

We may also collect special category personal data but we will only do this, where necessary, to meet our legal obligations under the Equality Act 2010 when recruiting. For example, to make reasonable adjustments for you, if you are disabled.

How we collect your personal data

We collect your personal data from the following sources:

- You, the candidate
- A recruitment agency, from which we may collect CV details and contact information such as your name, title, address, phone number, personal email, date of birth, gender, employment history, and qualifications
- Your named referees, to confirm employment history, qualifications, or any other relevant information

We may also engage third-party service providers to support with recruitment checks, including identity verification, referencing, or compliance screening, where applicable.

How we use your personal data and our lawful bases

We may collect and use the following types of personal data about you for the purposes explained below:

Purpose	Categories of personal data	Lawful Basis for Processing
<p>Assess your skills, qualifications, and suitability for the role</p>	<p>Name and contact details (address, mobile phone number and email address)</p> <p>Date of birth and gender (if applicable to the role)</p> <p>Work history and employment positions held</p> <p>Salary, other compensation, and benefits information</p> <p>Nationality / visa / work permit information (where applicable)</p> <p>Academic and professional qualifications, education, and skills</p> <p>Photographs you may submit with your application</p> <p>Your location</p> <p>Records we create during interviews or correspondence with you</p> <p>Results of pre-employment screening checks such as references or DBS checks (where applicable)</p>	<p>Processing is necessary for taking steps to enter into a contract with you or for the performance of our contract with you</p>

	Any other information you choose to give us or we collect from a third party	
To make reasonable adjustments for you during the interview process and comply with our legal obligations under the Equality Act 2010 and comply with any other legal or regulatory requirements	Special category personal data	<p>Processing is necessary for us to comply with our legal obligations.</p> <p>For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights.</p>
To conduct pre-employment screening checks including checking your identity and your right to work in the UK and reference checks	<p>Name and contact details (address, mobile phone number and email address)</p> <p>Identity data</p> <p>Date of birth and gender</p> <p>Nationality / visa / work permit information (where applicable)</p> <p>Contact details of referees</p>	<p>Processing is necessary for us to comply with our legal obligations.</p> <p>For special category data, the additional basis that we rely on relates to our obligations in the field of employment and the safeguarding of your fundamental rights.</p>
Communicate with you about the recruitment process	Name and contact details (address, mobile phone number and email address)	It is in our legitimate interests to keep you updated with the recruitment process and to keep records relating to the hiring process until it has been completed as it is beneficial to our business to fill the role.

How we make decisions

Having received your CV and covering letter, we will process that information to decide whether you meet the basic requirements to be shortlisted. If shortlisted, we will invite you to interview, where your responses will help us decide whether to offer you the role.

If we offer you a role, we may request references, undertake identity verification, and (where necessary for the position) before confirming your appointment.

If you fail to provide personal data

If you fail to provide information that is necessary for us to consider your application (e.g. references, proof of qualifications,), we may not be able to take your application further.

Automated decision-making

You will not be subject to decisions that have a significant impact on you based solely on automated decision-making.

Who we share your personal data with

Within our organisation, your personal data will only be shared with those who need to have access to it, which will primarily be our HR personnel and hiring managers.

Outside our organisation, we may share your personal data with service providers to our business who process personal data on our behalf. All third-party service providers are required to handle your personal data in accordance with our instructions and applicable data protection laws. They are not permitted to use your personal data for their own purposes.

We may also share your personal data with trusted third parties involved in the recruitment process, such as recruitment agencies, background check providers, or reference checkers. We may also share your personal data with our outsourced Data Protection Officer, Evalian Ltd, if the need arises.

International transfers

Your personal data will **not** be processed outside of the UK, unless you contact our EU representative, who is based in the EU.

How long we keep your personal data

We destroy your personal data immediately after communicating our decision about whether to appoint you.

Your information rights

You have certain rights in relation to the processing of your personal data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the personal data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your personal data.
- **Right to object to processing**
You have the right to object to us processing your personal data. If you object to us using your personal data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your personal data.

- **Right to portability**
You have the right to ask us to transfer your personal data to another party.
- **Automated decision-making.**
You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. As mentioned above, we do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your personal data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

How to exercise your rights

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

Our EU representative

We have appointed GRCI Law Limited (of GRC International Group) to act as our EU representative. If you wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR) or have any queries in relation to your information rights under the EU GDPR, please contact them using the following contact details:

eurep@grcsolutions.io

Please ensure that you include our company name in any correspondence you send to our EU Representative.

Complaints

You have the right to complain if you consider that we have not complied with the data protection law when handling your personal data. We will acknowledge receipt of your complaint within 30 days, investigate the matter without undue delay, and keep you informed of the progress and outcome. If you wish to complain please use the contact details given below under “How to contact us and our Data Protection Officer”. We will do our best to resolve the matter to your satisfaction.

If you are not satisfied with the outcome of your complaint, you can complain with the relevant supervisory authority. The supervisory authority in the UK is the Information Commission who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113


For supervisory authorities in other countries within the EU see the link below:


https://edpb.europa.eu/about-edpb/about-edpb/members_en

How to contact us and our Data Protection Officer

We have appointed Evalian Limited as our Data Protection Officer. They can be contacted as follows:

 Email: privacy@aviatorhampshire.com

 Postal Address: DPO, Aviator Hampshire, 55 Farnborough Road, Hampshire, GU14 6EL

 Phone: 01252 555 890

Changes to this privacy notice

We may update this privacy notice from time to time in response to changes in applicable laws and regulations and our processing practices. When changes are made, we will update the effective date at the top of this document.