

Candidate and Referee Privacy Statement

Introduction

We at **Dovida** appreciate your application. Your privacy is important to us, and we are committed to protecting the personal data that you provide to us or that we receive as part of our recruitment process.

This Candidate and Referee Privacy Statement explains how Cuala Senior Care Limited t/a Dovida processes personal data when you apply for a role with us, when you use our recruitment systems, and when a person acts as a referee in connection with an application.

This statement applies to applications made through www.dovida.ie, any third-party recruitment website, job board, recruitment tool or portal, and any recruitment or reference-checking platform used by Dovida, including Fountain and, where applicable, HiPeople.

We process personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR), the Data Protection Act 2018 and other applicable data protection laws.

Who We Are

Throughout this policy, "**Dovida**" or "**we**" or "**us**" or "**our**" refers to Cuala Senior Care Limited t/a Dovida, a company registered at Block 4, Bracken Business Park, Bracken Road, Sandyford, Dublin 18, D18 V0Y0, Ireland.

Dovida is the controller of personal data processed for its recruitment activities. This means Dovida determines the purposes and means of the recruitment processing described in this statement.

Fountain is used as Dovida's applicant tracking system. HiPeople may be used for automated reference-check administration. For Dovida recruitment processing, these providers act as processors and process personal data under Dovida's instructions and subject to contractual data protection safeguards. Their own privacy information may also apply to any limited processing they carry out for their own platform, security or service-administration purposes.

How to Contact Us

- **Data protection officer:**
Name: XpertDPO
Email: privacy@dovida.ie
- Writing to us at our address: Block 4, Bracken Business Park, Bracken Road, Sandyford, Dublin 18, D18 V0Y0, Ireland.

How We Use Recruitment Systems

Dovida uses recruitment systems to manage the recruitment process from initial application through to interview, reference checks and onboarding, where applicable. These systems help us receive applications, communicate with candidates, manage recruitment workflow, obtain references and keep recruitment records.

Routine recruitment processing is not based on consent. It is carried out because it is necessary to take steps at the candidate's request before entering into a possible employment or engagement contract, because Dovida must comply with legal obligations, and/or because Dovida has legitimate interests in operating a fair, secure and efficient recruitment process.

Where a platform displays an “I agree” checkbox for texts, calls or platform terms, this should not be read as changing Dovida’s lawful basis for routine recruitment processing. Dovida will use recruitment contact details to communicate about the application process and candidates may update communication preferences where available.

Candidate Data We Collect

- identity and contact details, such as name, address, email address and phone number;
- application details, such as role applied for, location preferences, qualifications, training, employment history, CV, interview notes and application responses;
- right-to-work, permit, Garda vetting, police clearance or safeguarding information where required or authorised by law;
- reference information, including the names and contact details of referees nominated by the candidate and reference responses received;
- communication data, including emails, SMS, calls, WhatsApp or other recruitment messages, depending on the contact method used;
- technical and usage data generated by recruitment platforms, such as device, browser, IP address, timestamps, audit logs and security records;
- financial or payroll details only where relevant to onboarding or employment administration for successful candidates; and
- special category data only where necessary and proportionate, as described below.

Referee Data We Collect

If a candidate nominates a referee, Dovida or its processor may process the referee’s name, job title, organisation, relationship to the candidate, contact details, reference response, and technical information generated by the reference-checking platform. Referees can choose whether or not to provide a reference.

Candidates should only provide referee details where they have a reasonable basis to do so and should, where possible, let the referee know that Dovida or its processor may contact them for a reference.

Use of Fountain, HiPeople and other recruitment systems

When you apply for a role, Dovida uses recruitment systems to receive, manage and progress your application and, where relevant, to request and manage references. This routine recruitment processing is not based on consent. It is carried out because it is necessary to take steps at your request before entering into a possible employment or engagement contract, because Dovida must comply with legal obligations, and/or because Dovida has legitimate interests in running a fair, secure and efficient recruitment process.

Your choices

You may object to processing based on legitimate interests and may change communication preferences where the system allows this. If you do not provide information needed to assess or progress your application, Dovida may be unable to continue with that application. Where any future optional processing is introduced, it should be presented separately and should not be bundled into the application process.

Special Category Data and Criminal Offence Data

Special category data is data which receives additional protection under GDPR, including data concerning health, disability, racial or ethnic origin, religious or philosophical beliefs, trade union membership, genetic or biometric data used for identification, sex life or sexual orientation. Criminal offence and Garda vetting data is treated separately and is also subject to additional safeguards.

Dovida will only collect and process special category data or criminal offence data where it is relevant, necessary and proportionate for the recruitment process, legal obligations, safeguarding, reasonable accommodation, assessment of role suitability/working capacity, equality or employment obligations, or the establishment, exercise or defence of legal claims.

Examples may include health or disability information needed to provide reasonable accommodation during recruitment, fitness or working-capacity information where relevant to the role, Garda vetting or police clearance information where required or authorised by law, and any other information required to meet employment, safeguarding or regulatory obligations.

How Personal Data Is Collected

- directly from candidates when they apply, complete forms, attend interviews, provide documents or communicate with Dovida;
- from referees when they provide a reference or respond through a reference-checking platform;
- from recruitment platforms, applicant tracking systems, reference-checking tools and related service providers used by Dovida;
- from third parties where relevant to recruitment, including Garda vetting/police clearance bodies, previous employers, training providers, professional advisers, regulators or public authorities; and
- automatically through cookies, security logs, device identifiers and other technical data when candidates or referees use recruitment websites or platforms.

Changes to the privacy policy and your duty to inform us of changes to your data.

We reserve the right to update this Privacy Policy at any time, without prior notice. We encourage you to regularly check the Privacy Policy for any changes.

It is important that the personal and Special Category data we hold about you is accurate and current. Please keep us informed if there are any changes during our relationship with you.

Referee Data:

If you nominate a referee, we will process the referee name, role, organisation, relationship to you and contact details so that we or our processor can request a reference. When a referee responds, we process the reference response and related technical data generated by the reference-check platform. For referees, the lawful basis is Dovida's legitimate interests in verifying candidate suitability and managing recruitment, balanced against the referee's rights and expectations. Referees can choose not to respond and can contact Dovida about their data protection rights.

Purposes and Lawful Bases

Depending on your location, the type of data that we collect and process from you provide may differ.

PURPOSE/ACTIVITY	DATA USED	LAWFUL BASIS / CONDITION
Register and manage a candidate profile/application in Fountain or another recruitment system.	Identity, contact, location, application, profile, device/ log data.	Article 6(1)(b): steps before a possible contract. Article 6(1)(f): recruitment administration, system security and workflow management.
Assess and progress an application, including interviews, selection workflow and onboarding where applicable.	Application details, qualifications, employment history, interview notes, references, training, right-to-work/onboarding data.	Article 6(1)(b): steps before a possible contract. Article 6(1)(c): legal obligations where applicable. Article 6(1)(f): fair and efficient recruitment administration.
Request and process references using HiPeople or another reference-checking provider.	Candidate reference details; referee name, role, organisation, contact details, relationship to candidate, reference response and platform technical data.	Candidate data: Article 6(1)(b), because references form part of the candidate recruitment process. Referee data: Article 6(1)(f), Dovida's legitimate interests in verifying suitability and managing recruitment, balanced against the referee's rights and choice not to respond.
Carry out Garda vetting, international police clearance, right-to-work, permit, safeguarding or other legally required checks.	Identity, contact, document, vetting, permit, criminal offence or regulatory data where required or authorised.	Article 6(1)(c): legal obligation. Article 10 GDPR / Data Protection Act 2018 where criminal offence data is processed. Article 6(1)(b) may also apply for steps before contract where checks are part of onboarding.
Provide reasonable accommodation and assess role-related health, disability or working-capacity matters where relevant.	Health, disability, accommodation, fitness or working-capacity information.	Article 6(1)(b), 6(1)(c) and/or 6(1)(f), depending on the context. Article 9(2)(b) and Data Protection Act 2018 section 46 where necessary for employment law rights or obligations. Article 9(2)(h) may apply where working-capacity assessment is carried out under appropriate health/confidentiality safeguards.
Communicate with candidates about the application process.	Contact details, message content, communication preferences and platform message logs.	Article 6(1)(b): application communications. Article 6(1)(f): recruitment administration and keeping communications secure and auditable. Candidate contact about the live application is operational, not marketing.
Administer and protect recruitment systems and Dovida's business.	Device, usage, log, audit, security and troubleshooting data.	Article 6(1)(f): IT administration, security, audit, fraud prevention, service continuity and network security.
Retain recruitment records and manage queries, complaints, rights requests or legal claims.	Application records, communications, reference information, decision records and audit logs.	Article 6(1)(c): legal obligations where applicable. Article 6(1)(f): records management and defence of claims. Article 9(2)(f) where special category data is necessary for legal claims.
Contact candidates about materially similar future opportunities during the applicable recruitment retention period, if Dovida chooses to do so.	Identity, contact, application status, role/location preference and recruitment history.	Article 6(1)(f), subject to clear retention limits and a simple right to object/opt out. Do not retain candidates beyond the defined retention period or use a broad talent pool unless Dovida has separately assessed the basis, notice and retention period.

AI and Automated Tools

Dovida may use recruitment tools which include limited AI or automation to support administrative recruitment tasks. Dovida does not use these tools to make solely automated hiring decisions.

For HiPeople reference checks, current vendor confirmation is that AI may be used only to generate optional job-specific reference questions from a job description.

For Fountain/Cue, current vendor confirmation is that Cue is an administrative/workflow assistant and is not used by Dovida to score, rank, filter, evaluate, reject or progress candidates, or to make or recommend hiring decisions.

Disclosures of your Personal Data

Dovida may share personal data where necessary for the recruitment purposes described in this statement. This may include sharing with internal Dovida teams, local offices, Dovida group/network companies where relevant to recruitment administration, IT and system administration providers, applicant tracking system providers, reference-checking providers, communication providers, professional advisers, insurers, auditors, regulators, public authorities and other third parties where required or permitted by law.

Where third-party service providers process personal data on Dovida's behalf, they do so as processors under contract and must process the data only on Dovida's documented instructions, subject to appropriate security and confidentiality obligations. We share personal data with service providers and processors where necessary for the recruitment purposes described in this notice. We do not need candidate or referee consent to use processors where appropriate Article 28 GDPR arrangements and safeguards are in place.

International transfers

Some external providers may process personal data outside the EEA. Where this happens, Dovida will ensure that an appropriate transfer mechanism and safeguards are in place, such as an adequacy decision, the EU Standard Contractual Clauses and any additional measures required by data protection law.

Data security

Dovida uses appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These measures include access controls, role-based permissions, encryption where appropriate, audit logs and contractual controls for processors.

Data retention

Where an application is unsuccessful, Dovida will retain recruitment records for 18 months, unless a longer period is required or permitted by law, for example to deal with queries, complaints, legal claims, audit requirements or regulatory obligations.

During the applicable retention period, Dovida may contact a candidate about materially similar future opportunities where this is reasonable and within the candidate's expectations. Candidates may object to this at any time.

Where an application is successful, recruitment information will be retained as part of the personnel file and in accordance with Dovida's employee data retention policy.

Your legal rights

Under data protection law, candidates and referees may have the right to request access to their personal data, request correction, request erasure, object to processing based on legitimate interests, request restriction of processing, request portability where applicable, and complain to the Data Protection Commission.

Where Dovida relies on legitimate interests, candidates and referees have the right to object to that processing. Dovida will consider any objection in accordance with GDPR.