

# Subject Access Request Process

Adzuna process document for *Find a job*

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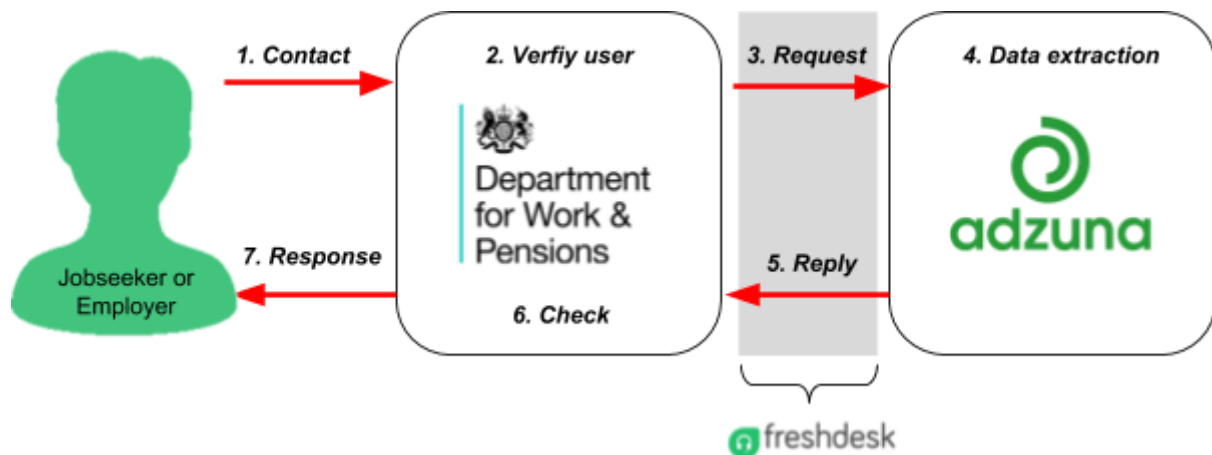
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# Overview

This document sets out the Adzuna process steps for fielding Subject Access Requests (SARs) sent by DWP to the Adzuna Helpdesk. It specifies the DWP process requirements, but not the details of how these requirements should be met (since these are covered in an internal DWP document).



## Key steps

### 1. Contact

A SAR contact from a user of Find a job may come to DWP from a number of sources, including:

- The 'Contact us' form on *Find a job*
- Email sent to some other DWP email address
- Fax
- Post

In rare cases SARs may come from third parties such as solicitors.

GDPR guidance is that the request should be made in writing. See the [ICO Subject access code of practice](#) for further information.

### 2. Verify user

DWP must verify the identity of the person making the request using 'reasonable means'. Where the contact has come through the 'Contact us' form of *Find a job* then, if the user is logged in at the time, verification of the user's identity will be confirmed in the message received by DWP support. In other cases it is DWP's responsibility to verify the user in accordance with ICO guidelines.

### 3. Request

Once the user's identity has been successfully verified DWP need to send a ticket to Adzuna via Freshdesk detailing:

- The email address of the user (and/or user ID)
- The details of any information being requested by the user (either 'everything' or a defined subset)
- Date of valid request

### 4. Data extraction

Once the request is received, Adzuna will first acknowledge it and then proceed to extract all the relevant data for the individual user (see Appendix for further details).;

In order to comply with the GDPR 'right to data portability' the data will be provided in a structured, commonly used and machine readable form. This may include spreadsheet or CSV formats.

**Timescales:** Adzuna will endeavour to respond within 5 working days or sooner. This should ensure that the final response back to the requester of the SAR can be done well within the time limit of 1 month of the request.

### 5. Reply

Adzuna will reply to the Freshdesk ticket from DWP with the corresponding SAR data securely attached.

### 6. Check

When received, DWP should perform basic checks on the data, including:

- Is the data for correct individual?
- Can it be easily opened and read?
- Does the DWP itself hold any other data on the particular individual which should be added to the SAR data? (for example historic email communication between the user and DWP)

### 7. Respond

Once checks have been completed, the SAR data should be securely sent to the requesting individual. This may be via email or post, and in any case **within 1 month of the request**.

## Appendix - SAR Data

### Jobseekers

The following *Find a job* data will be extracted for user type of Jobseeker:

Data Type	Data
User data	User ID
User data	Email address
User data	IP address of last login
User data	Date account created
User data	CV(s)
Suspension history	Date(s) suspended/unsuspended, suspension reason
Activity history - Job views	List containing: job title, company name, company location, and date of job view (all data in archive)
Activity history - Searches	List containing: what, where, page number, and date of search (all data in archive)
Activity history - Applications	List containing: job title, company name, company location, date of application and method of application (Find a job, Employer's website, phone) (all data in archive)

### Jobseekers (with EURES Jobseeker Profile)

The following Find a job data will be extracted for user type of Jobseeker who has created a job seeker profile for the EURES platform<sup>1</sup>:

Data Type	Data
Activity History (EURES)	Date of creation of EURES Jobseeker profile
User data	Given name
User data	Family name
User data	Telephone number
User data	Mobile telephone number
User data	Email address
User data	Address
User data	Country

<sup>1</sup> Note that EURES Jobseeker profiles will not be available for launch

User data	Residency country
User data	Nationality
User data	Birth date
User data	Gender
User data	Primary language
Candidate Profile	Candidate objective
Candidate Profile	Executive summary
Educational history	Educational organisation name
Educational history	Educational level
Educational history	Programme name
Educational history - Attendance period	Start date (YYYY-MM)
Educational history - Attendance period	End date (YYYY-MM)
Position history	Position title
Position history	Employment organisation name
Position history	Employment period
Position history	Description
Position history	Job category code

## Employers

All of the above Find a job data for the Jobseeker user type will be extracted plus the following if the user is also a primary or recruiter Employer:

Data Type	Data
User data	Date last updated
User data	Status
User data	Name
User data	Telephone number
User data	Preferred contact method (phone, email)
Company data	List of associated Companies and role within each Company (Primary or Recruiter)

## Log files and database tables

In addition to the data detailed above, relevant log files and database tables will be searched for data relating to the user ID which is not already included the data above.

## Appendix - Other documentation

ICO guidelines relating to the GDPR 'right of access' (which supercedes the DPA guidelines on SARs):

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

ICO's Subject Access Code of Practice:

<https://ico.org.uk/media/for-organisations/documents/2014223/subject-access-code-of-practice.pdf>