



PRIVACY IN RECRUITING

Effective: May 5, 2025

POLICY

Avesta Housing is committed to protecting the privacy and confidentiality of personal information collected from job applicants during the recruitment process. In accordance with applicable federal and state privacy laws and best practices, we maintain a clear and accessible privacy policy that outlines how applicant information is collected, used, shared, and retained. This policy is publicly available on all candidate-facing recruitment pages, including our careers site, job postings, application forms, and interview scheduling tools.

Avesta Housing collects applicant information solely for the purpose of evaluating candidates for employment, communicating with applicants, and fulfilling legal and regulatory obligations. The Organization does not sell applicant information or use it for purposes unrelated to recruitment unless required by law.

PROCEDURE

1. **Scope**— This policy applies to all external job applicants who apply for employment with Avesta Housing and interact with our digital recruiting platforms. Internal job candidates should refer to internal HR data policies.
2. **Privacy Policy Content**— Avesta Housing will maintain a recruiting-specific privacy policy that describes:
 - a. What personal data is collected during recruitment (e.g., name, contact info, employment history, references).
 - b. How the data is used and for what purposes.
 - c. Who has access to the data and with whom it may be shared (e.g., background check vendors, interview platforms).
 - d. How long data is retained and under what conditions it may be deleted.
 - e. Applicant rights regarding their personal information, including how to request access, correction, or deletion.
3. This policy will be posted via a direct link embedded in all candidate-facing pages through our HRIS (Paylocity Recruiting Module). It will also be posted on a dedicated page on the Avesta Housing website.
4. **Annual Review**— The HR Director or their designee will review the *Recruiting Privacy* policy at least annually to ensure compliance with any changes in data protection regulations or internal data practices. Any updates will be reflected in the HRIS system and on the Avesta Housing website.

5. **HRIS Configuration**— The HRIS Administrator will configure the Recruiting Module to display the privacy policy link on all public-facing recruiting pages, including:
 - a. Careers landing page
 - b. Online job application forms
 - c. Interview self-scheduling pages

6. **Training and Awareness**— HR team members involved in hiring will be trained on proper handling of candidate data, including confidentiality obligations and appropriate use of applicant information. Hiring managers will receive training on the privacy expectations tied to recruitment records and communications.

7. **Candidate Inquiries**— Candidates with questions or concerns about how their information is handled during the recruitment process may contact the HR Department at HR@AvestaHousing.org.