GORDONSTOUN
Japan

Gordonstoun Japan — Recruitment Privacy Notice

Introduction

Your privacy is important to us. This Recruitment Privacy Notice explains how we collect, use, share, store, and protect personal information about individuals applying for employment at Gordonstoun Japan, including candidates who enquire about roles or are considered for vacancies. It should be read alongside our general Privacy Policy at www.gordonstoun.jp/privacy. This notice relates specifically to recruitment; if you become an employee, a separate Employee Privacy Notice will apply.

1. Who We Are

Gordonstoun School Japan West is operated by **OCC Educational Corporation** (hereinafter referred to as "OCC", "we", "us", or "our"). OCC is incorporated and registered in Japan as an educational institution (Corporate Registration Number: 1120005004776), with its registered office at 1-3-61 Maruyamadori, Abeno-ku, Osaka-shi, Osaka 545-0042, Japan. OCC is the data controller responsible for handling personal information in connection with recruitment. For privacy enquiries or to exercise your rights, please contact: **privacy@gordonstoun.jp**.

2. Applicable Law & Legal Basis

We handle personal information primarily in accordance with Japan's **Act on the Protection of Personal Information (APPI)** and other applicable Japanese laws. Where recruitment activities involve applicants residing in the United Kingdom (UK) or European Economic Area (EEA), UK or EU Data Protection Law (GDPR) may also apply.

Legal Bases for Processing (where GDPR applies):

- **Pre-contractual Steps:** Processing necessary to evaluate your application and enter into an employment contract.
- **Legitimate Interests:** Evaluating suitability, safeguarding students, and managing school recruitment effectively.
- **Legal Obligations:** Complying with statutory safeguarding, employment, and immigration regulations.
- **Consent:** Retaining your details for future job opportunities or specific cross-border transfers where required by law.

3. Information We Collect

Depending on the role and stage of recruitment, we may collect and process:

- **Identity & Contact Details:** Name, home address, email address, telephone number, nationality, and right-to-work / visa eligibility in Japan.
- **Application Details:** CV/resume, application forms, employment history, education, academic qualifications, professional registrations, and skills.

- **Assessment Records:** Interview notes, assessment test results, candidate communication history, and salary expectations.
- **Verification & Background Check Information:** References from previous employers, educational verification, and relevant criminal record / safeguarding background checks (where applicable and permitted by law).
- **Special Category / Sensitive Data:** Information concerning health, reasonable adjustments required for interviews, or background checks required for safeguarding pupils. Sensitive data is collected strictly as permitted or required by applicable law.

4. How We Collect Information

We collect information directly from you through application forms, email submissions, online portals / Applicant Tracking Systems (ATS), and interviews. Where appropriate and legally permitted, we may also collect information from third parties, including:

- Designated referees and previous employers;
- Educational and professional credential verification bodies;
- Recruitment agencies;
- Authorized background-checking and screening agencies;
- Publicly available professional platforms (e.g., LinkedIn).

We will inform you before approaching referees or current/previous employers, and obtain consent where required by law.

5. How We Use Your Information

We use your personal information for the following specific purposes:

- Assessing candidate qualifications, suitability, and fitness for roles at Gordonstoun Japan;
- Communicating with you regarding interviews, updates, and application outcomes;
- Conducting background, reference, identity, and pre-employment checks;
- Fulfilling safeguarding obligations to ensure child safety within the school environment;
- Managing immigration, visa sponsorship, and relocation processes for successful candidates;
- Managing talent pools and considering candidates for future vacancies (subject to consent);
- Complying with legal, regulatory, and administrative obligations.

6. Safeguarding and Pre-Employment Checks

As an educational institution, pupil protection and safeguarding are paramount. Subject to applicable laws and role requirements, pre-employment screening may include:

- Identity and right-to-work verification;

- Direct verification of employment history and qualifications;
- Criminal record checks and overseas child protection clearances (for jurisdictions where candidates have lived or worked).

Third-party background check providers may be engaged to perform these checks. Access to background check results is strictly restricted to personnel directly involved in safeguarding and recruitment decision-making.

7. Sharing Your Information

Your personal information will be accessed only by authorized personnel on a need-to-know basis. Recipients may include:

- **Authorized OCC Employees & Advisors:** OCC recruitment committees, HR staff, and designated external recruitment consultants bound by confidentiality agreements.
- **Gordonstoun International:** Authorized representatives of Gordonstoun International or affiliated educational entities assisting with recruitment, shortlisting, and panel interviews.
- **Third-Party Service Providers:** Background checking companies, Applicant Tracking System (ATS) vendors, IT and cloud storage providers, and immigration/relocation consultants assisting with offer fulfillment.
- **External Entities:** Referees, educational institutions, professional regulatory bodies, legal advisors, and competent public authorities where legally mandated.

We do not sell personal information. All third-party providers handling data on our behalf are contractually required to maintain strict confidentiality and adequate security standards.

8. International Transfers and Storage

Because Gordonstoun Japan operates internationally, candidate personal data may be transferred to, stored, or accessed by recipients outside Japan, including in the **United Kingdom**, **United Arab Emirates (UAE)**, and other countries where candidates, referees, background checking agencies, or interview panels are located.

- **Compliance with APPI & GDPR:** Transfers of personal data outside Japan or the UK/EEA are conducted in accordance with statutory requirements (APPI Article 28 / GDPR Chapter V). We utilize standard contractual safeguards, institutional data-sharing agreements, or explicit consent to ensure your data receives an equivalent level of protection regardless of location.
- **Storage Security:** Electronic recruitment files are stored securely within cloud storage systems, encrypted databases, and password-protected systems with multi-factor authentication (MFA) and access permissions restricted to authorized recruitment staff.

9. Retention of Candidate Data

We retain candidate personal information only for as long as necessary to complete the recruitment process and meet legal obligations:

- **Unsuccessful Candidates:** Personal information will be retained for **6 months** following notification of the recruitment outcome, after which it will be securely deleted or anonymized.
- **Retention for Future Vacancies (Talent Pool):** If you consent to being considered for future employment opportunities at Gordonstoun Japan, we will retain your CV and contact information for up to **2 years** from the date of application. You may withdraw your consent at any time.
- **Successful Candidates:** Information collected during recruitment will be transferred to your employee personal file and retained in accordance with our Employee Privacy Notice.

10. Security Measures

We implement technical and organizational security measures to safeguard recruitment data against unauthorized access, destruction, loss, alteration, or disclosure. Key measures include:

- Encryption of data in transit and at rest;
- Role-based access restrictions and user authentication controls;
- Non-Disclosure Agreements (NDAs) signed by third-party advisers/consultants;
- Regular security reviews of cloud providers and software systems.

11. Your Rights

Depending on your jurisdiction, you may have the following rights regarding your personal information:

- **Access:** Request a copy of the personal information held about you.
- **Correction:** Request correction of inaccurate or incomplete data.
- **Deletion / Erasure:** Request deletion of your personal data where retention is no longer necessary.
- **Restriction / Object:** Request restriction of processing or object to certain processing activities.
- **Withdrawal of Consent:** Where processing is based on consent, you may withdraw consent at any time without affecting prior lawful processing.

To exercise these rights, contact **privacy@gordonstoun.jp**. We will respond within the statutory timeframe under applicable law.

12. Updates to This Notice

We may update this Recruitment Privacy Notice periodically. Any revised version will be published on our website or distributed to applicants directly.

Last Updated: October 2026