

Recruitment Privacy Policy, HR.RP001

Effective Date: June 2025

POLICY:

At Northern Illinois Hospice, we are committed to respecting and protecting the privacy of all individuals who apply for employment. This Recruitment Privacy Policy outlines how applicant data is collected, used, stored, and shared in compliance with applicable U.S. and Illinois privacy laws and industry best practices.

1. Who This Policy Covers:

This policy applies to any person who submits an application for employment with Northern Illinois Hospice, whether through the organization's website, a third-party platform, in person, or via email. It covers all recruitment related data activities from application submission through final hiring decisions.

2. What Information Is Collected:

Northern Illinois Hospice may collect the following types of personal information during the recruitment process:

- **Contact Information:** Name, address, email address, phone number
- **Employment & Education History:** Resume/CV, work experience, qualifications, degrees, certifications, references
- **Job-Related Information:** Desired salary, availability, job preferences, cover letters, interview responses
- **Voluntary Demographic Information:** Race, ethnicity, gender, veteran status, disability status (collected anonymously for equal opportunity reporting in compliance with EEOC requirements)
- **Work Authorization Information:** Eligibility to work in the U.S.
- **Background Screening Data** (as applicable): Criminal history, employment verification, reference checks, where applicable. All background checks are conducted in compliance with the Fair Credit Reporting Act (FCRA) and Illinois state laws.
- **Biometric Data:** If biometric information is collected, such as fingerprints required by the Illinois Department of Public Health (IDPH), the fingerprinting is conducted by a third-party vendor authorized by the Department. Any biometric data collected is managed in compliance with the Illinois Biometric Information Privacy Act (BIPA), including obtaining written consent, providing proper disclosure, ensuring secure storage, and arranging for timely destruction.
- **Assessment Data:** Includes information related to an applicant's personality, competencies, and overall suitability for a position, which

may be gathered through interviews, assessments, or evaluation tools used during the recruitment process.

Northern Illinois Hospice processes personal information that applicants provide directly, such as registering in the career portal, submitting a job application, or participating in phone or in-person interviews. Information may also be obtained from external sources, including references, referral sources, background or employment check vendors, and publicly available online content, such as professional networking sites (e.g., LinkedIn), if made available by the applicant.

Applicant data will be stored in a range of different places, including our Application Tracking and HR System and on other internal IT systems, including email.

3. How Information is Used

Applicant information is used for lawful recruitment and hiring purposes, including to:

- Assess qualifications and suitability for employment
- Communicate during the application process
- Schedule interviews and communicate hiring decisions
- Conduct background checks and reference verifications, where permitted
- Comply with federal, state, and local employment laws
- Maintain a record of recruitment activity

4. Background Screening

- If a conditional offer of employment is extended, Northern Illinois Hospice will conduct a background check directly or through a third-party service provider.
- Background screening is conducted where permitted by law and to the extent appropriate and relevant to the position offered.
- Criminal background data will be reviewed in accordance with applicable laws.
- When a background screening is required, the applicant will be contacted by the background screening provider for authorization and will receive further details about the process and the data involved.

5. Data Sharing and Disclosure

Northern Illinois Hospice does not sell or rent applicant data. Data may be shared only as needed for recruitment purposes with the following:

- Internal HR staff and hiring managers
- Third-party service providers (e.g., applicant tracking systems, background check vendors)
- Government agencies when required by law

All third party vendors are required to safeguard data and use it only for authorized purposes.

6. Biometric Information (BIPA Disclosure)

If biometric data (e.g., fingerprints) is collected during or after the recruitment process:

- The applicant will be informed in writing and asked to provide explicit written consent
- Biometric data will be securely stored, not disclosed without authorization, and deleted in accordance with timelines established by law.
- All handling of biometric data is conducted in compliance with the Illinois Biometric Information Privacy Act (BIPA)

7. Data Retention

- Northern Illinois Hospice retains applicant data only as long as necessary for recruitment or as required by law.
- If hired, the data collected during the recruitment process will be transferred to the employee's electronic Human Resources file. and is retained according to applicable federal and state regulations.
- If an applicant is not hired, personal data will be retained following the conclusion of the recruitment process to comply with legal obligations and to allow consideration for future employment opportunities. Northern Illinois Hospice may maintain contact with applicants during this time for potential job openings.
- When data is no longer needed, it is securely disposed of through methods such as permanent electronic deletion, physical destruction, or anonymization in a non-recoverable format.

8. Applicant Rights

Applicants in the U.S. and Illinois may have the right to:

- Request access to personal data
- Request correction or deletion of personal information
- Object to certain types of data processing
- Withdraw consent, if processing is based on consent
- Decline to provide voluntary demographic or background check information, unless required by law

Requests related to these rights may be submitted to Human Resources at hr@niha.org or 815-398-0500.

9. How Data is Protected

Northern Illinois Hospice uses administrative, technical, and physical safeguards to protect applicant data, including:

- Password-protected systems
- Role-based access to application data
- Encrypted storage, where applicable
- Secure handling and disposal of physical and digital documents

10. Changes to This Policy

Northern Illinois Hospice may update this Recruitment Privacy Policy to reflect changes in practices or applicable laws. The most recent version will be available on the careers page and can be requested from Human Resources.