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Candidate data removal (pseudonymization)

Updated over a year ago

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This guide is part of Comeet's options for compliance with privacy regulations. See the overview here.

Many privacy regulations provide candidates with the right to erasure. This means that companies should delete all personally identifiable data if a candidate makes this request and there's no other legal basis or overriding legitimate grounds for retaining the candidate's data.

What is pseudonymization?

Pseudonymization is a data removal technique that allows deleting personally identifiable information from the company's records while allowing:

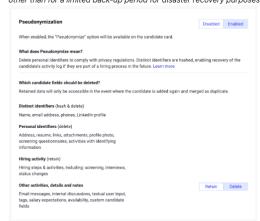
- · Retention of non-identifying traces of the candidate's activity for reporting purposes. While Comeet does not retain pseudonymized candidate profiles, the hiring activity, which is associated with those candidates, is retained and included in company reports.
- · Recovery of the candidate's history in case the candidate is added again or reapplies. If candidates are added again or reapply their pseudonymized profile may be identified as duplicate based on these values: name, phone, email address and LinkedIn profile URL. It's up to you to decide whether to merge the pseudonymized profile into the new candidate profile.

By merging the two profiles, all retained information (based on setting preferences) will become accessible, enabling recovery of the candidate's previous history or experience with your company.

Note: While pseudonymized candidates profiles become inaccessible immediately, candidates data may be stored for up to a year for the purpose of disaster recovery.

Set up your pseudonymization policy

- 1. Go to Company settings > Privacy settings (requires Admin or Owner role)
- 2. Scroll down to Pseudonymization.
- 3. Click Enabled.
 - When enabled, you can pseudonymize candidates manually from the candidate profile.
- 4. Select the fields to be retained or deleted when candidates are pseudonymized. Retained data will only be accessible should the candidate apply or be added again and merged as a duplicate candidate. This data will otherwise be irretrievable, other than for a limited back-up period for disaster recovery purposes.



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When to pseudonymize a candidate









When to pseudonymize a candidate

You may want to consider pseudonymizing a candidate when:

- Candidate requests that his/her data will be removed (in which case you may also want to consider their full deletion, not just pseudonymization)
- · Data retention period has ended

Pseudonymize a single candidate

- 1. Go to the candidate profile.
- 2. From **Privacy**, open the dropdown list.
- 3. Select Remove Candidate Profile (pseudonymize)
- 4. When prompted, click Remove candidate profile.

Pseudonymize multiple candidates

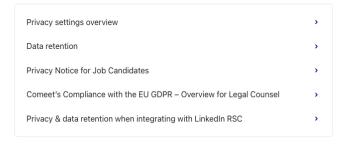
- Choose multiple candidates in the candidates list (hold Ctrl/Command and select several candidates or select by checking the Check icon).
- 2. From **Privacy**, open the dropdown list.
- 3. Select Remove Candidate Profile (pseudonymize)
- 4. When prompted, click Pseudonymize.

Pseudonymization in reports

Reports include records of pseudonymized candidates. Pseudonymized candidates names are shown as "(candidate removed)" and other details are blank.

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