

Candidate Privacy Notice (updated 20 April 2022)

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Pension Services Corporation Ltd (PSC) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice has been provided for individuals who wish to, or are already, applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

The General Data Protection Regulation ((EU) 2016/79) "GDPR" came into effect on 25 May 2018 and became the UK GDPR on 31 January 2021, and any references we make to it include the UK Data Protection Act 2018

This privacy notice provides you with certain information that must be provided under the GDPR. We, Pension Services Ltd of 14 Cornhill, London, EC3V 3ND, are responsible for your personal information. You can contact our Data Protection Officer by emailing us at dataprotection@pensioncorporation.com.

DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us as part of your application such as: in your curriculum vitae, a covering note, and other information you may provide regarding your notice period, your current salary and benefits.
- Any information you provide to us during an interview, including test results.

We will ask you for the following information if we decide to make an offer of employment:

- Personal details including name, title, address, date and place of birth, gender, nationality, marital status, National Insurance Number (or equivalent), professional qualifications and memberships, and decorations and awards.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition or disability status.

- Information about the existence of criminal records or of unspent criminal convictions relating to you.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate.
- If you were introduced to us by a recruitment agent, we will collect from them the following categories of data:
 - The information you have provided to them and which they have summarised, and shared with us, on your behalf.
- If you were introduced to us by a search firm that caters for senior roles, we will collect from them the following categories of data:
 - A personal reference, including information gathered from industry contacts.
- Hire Rite Ltd credit reference and background check provider, from which we collect the following categories of data:
 - Confirmation that you have passed or failed the credit check, including the credit report generated, and background check, and whether any issue should be raised for further discussion with you.
- World-Check database of Politically Exposed Persons (PEPs) and heightened risk individuals, from which we collect the following categories of data:
 - Confirmation that you have passed or failed the PEP check, or the Sanctions-list check, including the reports generated in conducting those checks, and whether any issue should be raised for further discussion with you.
- We may also collect information from publicly accessible sources, including the public electoral roll and, on occasion, social media.

HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to role, since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an

interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references **and** carry out background and credit check before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

Information about criminal convictions

We do not envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history in limited circumstances, and the information we collect will only involve details of whether the criminal record check is clear or if we should discuss this matter further with you. We are entitled to request that criminal records checks are carried out in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the Financial Conduct Authority and Prudential Regulation Authority to carry out criminal record checks for those carrying out certain roles.
- The role may require a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

DATA SHARING

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: A Recruitment Agency, if applicable, and Hire Rite Ltd for background and credit checks. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally

lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will you use my information for?

We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our Retention Policy and applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Report or lodge a complaint with a supervisory authority**

You also have the right to complain to the Information Commissioner's Office. You can contact them in the following ways:

- Phone 0303 123 1113
- Email: casework@ico.org.uk
- Live chat on their website <https://ico.org.uk/global/contact-us/live-chat>
- By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

If you would like to use any of these rights, or withdraw your permission to us processing your personal information, please contact us. We may keep a record of your communications to help us sort out any issues which you raise.