

Privacy Notice - Applicants for Employment

In order for Defaqto to recruit and select new employees, we need to collect and process personal data about applicants.

We are committed to being transparent about the way we do this – what we collect, how we store and use it, and who has access to it. We are also committed to meeting all of our legal obligations with regard to data protection.

1 What is the purpose of this document?

This document is provided by Defaqto Limited of Financial Research Centre, Haddenham Business Park, Haddenham, Aylesbury, Buckinghamshire, HP17 8LJ where personal data relating to applicants for employment is processed by the Company.

We are a “Data Controller” and collect, store, process, use, record, consult, disclose, erase, make decisions based upon, destroy and in some instances transmit personal data about you (together these activities are referred to as “Processing”).

This Privacy Notice concerns your personal data, referred to as “Data”. It describes how we collect and use Data about you during recruitment and selection, and gives examples of the Data we hold, Processing activities and the justifications for that Processing.

This Privacy Notice sets out the information that we must provide to you (the “Data Subject”) at the time your Data is collected.

The person responsible for overseeing data protection compliance within Defaqto is Alastair Brown, Chief Financial Officer. He can be contacted via email at dpcompliance@defaqto.com.

You may also contact Tara Hopkins, Head of HR, with questions about data protection compliance issues relating to applicants for employment at Defaqto. She can be contacted via email at recruitment@defaqto.com.

This Privacy Notice applies to applicants for employment. A separate Privacy Notice applies to current and former employees.

It is important you read this Privacy Notice so you are aware of how and why we are using Data about you. By applying for a vacancy and submitting your Data to Defaqto, you declare that you have read, understood and accepted the contents of this Privacy Notice.

2 What personal data do we collect?

Data means any personal data or special categories of data about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous data).

We may collect, store, use and Process the following Data about you:

- Name
- Personal contact details such as home address, telephone numbers, and personal email addresses
- CV and any other information provided to us as part of the application for employment process
- Notes made during interviews with you
- Results of any assessment exercises or personality profiling survey completed as part of the selection process
- Whether you have a disability for which we may need to make adjustments to our selection process
- Information about your entitlement to work in the UK
- Any other correspondence relating to your application and to our recruitment and selection process

This list is non-exhaustive.

Defaqto may collect this Data in a variety of ways. For example, you may apply through our website and enter Data directly into our recruitment system (CascadeGo). Alternatively, you may apply through another website or via a recruitment agency and be asked to complete an Application Form and provide a CV by one of our recruitment partners. The recruitment partner will then submit your Data into our recruitment system on your behalf and will provide you with a copy of this Privacy Notice.

Your Data may also be collected through interviews with you or by you completing an assessment process or personality profiling survey.

We may also collect Data about you from third parties, such as references from your former employers. We will only seek such Data once a job offer has been made to you and accepted by you and we will inform you that we are doing so.

3 Why do we Process your Data?

We need to Process your Data in order to take steps at your request prior to potentially entering into a contract with you.

In some cases, we need to Process your Data to ensure we are complying with legal obligations. For example, we need to see evidence of any successful applicant’s eligibility to work in the UK before employment can start.

Defaqto has a legitimate interest in Processing your Data during the recruitment and selection process and to keep records of the process. Processing Data from job applicants allows us to:

- manage the recruitment and selection process
- communicate with applicants
- assess and confirm suitability for employment
- decide to whom to offer employment

- determine the terms on which employment may be offered
- contact unsuccessful applicants again in the future if we feel they may be interested in other vacancies that arise
- produce statistics to monitor our recruitment and selection processes

This list is non-exhaustive.

We may also need to Process Data about applicants in order to respond to and defend against any complaints or legal claims.

We Process Data about whether or not you have a disability for which we may need to consider adjustments to our selection process or for which we may need to consider adjustments to the terms of employment if we were to offer you a job. We Process such Data in order to support applicants with disabilities appropriately and also to carry out our legal obligations with respect to the Equality Act. Data about an individual's disabilities is Special Category Data. We only Process it with your explicit consent and take particular care to ensure it is handled sensitively.

4 Who has access to your Data?

Your Data will be shared internally within Defaqto with those involved in the recruitment and selection process for the vacancy you have applied for. This includes members of the HR & Office Management team, the Recruiting Manager and any interviewers or other members of the selection team. Information is generally shared on a need to know basis.

Your Data is primarily stored within our recruitment system which is currently provided by Cascade HR Ltd. Our personality profiling survey is currently provided by Predictive Advantage Ltd. We reserve the right to change the providers of these services at any time.

Any third-party service providers are required to take appropriate security measures to protect your Data in line with our policies. We do not allow our third-party service providers to use your Data for their own purposes. We only permit them to process your Data for specified purposes and in accordance with our instructions.

We will not share your Data with any other third parties unless your application for employment is successful and we make you an offer of employment which you then accept. We will then share your Data with former employers, as agreed with you at the time, to obtain employment references for you.

5 For how long do we store your Data?

We store your Data throughout the recruitment and selection process for the vacancy you have applied for.

If your application for employment is unsuccessful, Defaqto will store your data on file for 12 months following the date on which the vacancy you applied for is closed.

We may then seek your consent to store your Data for longer than this. If you give your consent then we will contact you every year to check whether you still want us to store your data and to ask you to update your Data if necessary. You are free to withdraw this consent at any time. If you withdraw your consent, or we do not hear back from you when we contact you, then your Data will be securely destroyed.

If your application for employment is successful, when you commence employment with Defaqto then any Data collected about you during the recruitment and selection process will be transferred to your Employee Files and will be retained during your employment in accordance with our Employee Data Protection Policy. You will be provided with a new Privacy Notice at this time.

6 How do we protect your Data?

We take the privacy of your Data very seriously. We have internal policies and controls in place to ensure that your Data is not lost, accidentally destroyed, misused or inappropriately disclosed.

All employees involved in the recruitment and selection process at Defaqto are made aware of their responsibilities with regard to the personal data of applicants for employment.

Your Data is primarily stored within our recruitment system which is provided by Cascade HR Ltd. They have agreed to comply with our security policies and will only Process your Data as instructed by us.

7 Your rights as a Data Subject

You can:

- Obtain a copy of your Data on request
- Require Defaqto to change incorrect or incomplete Data
- Require Defaqto to delete or stop Processing your Data, where the Data is no longer necessary for the purposes it was collected
- Object to us Processing your Data where Defaqto is relying on its legitimate interests as the lawful basis for Processing your Data

If you would like to exercise any of these rights, please contact Tara Hopkins, Head of HR, by email at recruitment@defaqto.com.

If you believe that we have not complied with your data protection rights then you can complain to the Information Commissioner.

8 What if you choose not to provide your Data to Defaqto?

You are under no obligation to provide your Data to Defaqto. However, if you do not provide the information we request during the recruitment and selection process then we may not be able to process your application for employment.