

Candidate Privacy Notice

This privacy notice explains how we use the information collected about you during the recruitment process within the United Kingdom and Channel Islands only. If you are successful in your application and accept a role within TrinityBridge, you will receive a copy of our Employee Data Privacy Notice describing how we process your information as an employee.

Who are we

In this privacy notice, any reference to “we”, “us” and “our” means TrinityBridge.

We offer employment opportunities directly, or through employment agencies acting on your behalf. In addition, we use third party providers to assist throughout the candidate pre-employment Screening process.

Information we collect and process about you during the recruitment process

To progress through our pre-employment screening and evaluation process, we collect and process your personal information which includes, but is not limited to your name, address, telephone number, personal email address and employment and academic history.

If we make you an offer of employment, we will need to carry out pre-employment screening checks in line with our responsibilities. These can either be undertaken by us, or a third-party specialising in pre-employment screening who may contact you directly. If this is the case, we will inform you of the third party being used.

These checks will include (where legally permissible and relevant to your applied for role): a criminal record check, a right to work in the UK/Ireland check, an identity check, and financial standing and bankruptcy check, a directorships check, a compliance and anti-money laundering check, a CV check and gap analysis, five year employment/education referencing via HR departments including all periods of unemployment and self-employment a verification of your highest education, electoral roll and address verification, a reference check, a proof of relevant qualifications / education check, a FCA/PRA/Bank of England/Central Bank of Ireland regulatory check, a professional membership check, and a media search (which may include social media and search engine searches).

We will also ask you to complete a confidential medical questionnaire to enable us to make any reasonable adjustments that may be needed during your employment.

Criminal conviction data

For those positions where regulatory approval for an appointment is required, for example, FCA- designated senior management functions (under the SMCR regime), in addition to standard criminal records checks, we may ask exempted questions to fulfil our obligations under the Financial Services and Markets Act 2000 which may include the collection of information about convictions considered to be “spent” within the meaning of the Rehabilitation of Offenders Act 1974. We are permitted to, ask these questions and collect this information pursuant to Article 3 of the Rehabilitation of Offenders Act 1974 (Exemptions) Order 1975. In Ireland, we will take a similar approach, where permitted, and will rely on the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016.

Where we collect the information we hold about you Your personal information is collected from a number of different sources. Examples are:

- You – personal details, financial details, contact information, CV, etc.
- Recruitment Consultants (where used)
- Previous employers or referees
- Medical professionals
- HMRC, Revenue or other tax authorities
- Home Office and/or other government agencies/offices
- Credit Reference Agencies
- Fraud prevention agencies
- Vetting agencies
- Educational/training institution

Why we collect your personal information and the legal basis for doing so

We need your personal information to enable us to contact you, evaluate your suitability for roles and where successful provide an offer of employment.

To ensure we are meeting our responsibilities when processing your personal information, we must have a suitable legal basis to do so. Examples are below:

- **Performance of contract:** For example, as a prospective employer, we process your personal information where it is necessary for the performance of the contract of employment, to take steps prior to entering into such a contract
- **Legal obligation:** For example, where laws or regulations may require us to use your personal information in certain ways such as where it is needed for meaningful equal opportunities and diversity monitoring
- **Legitimate interests:** We will also process your personal information where this processing is in our “legitimate interests” which does not outweigh yours, or your rights or freedoms, and will be supported by a balancing test, for example security activities, running and management of our business
- **Consent:** In rare circumstances, we may need your consent to process your personal information, such as using your image for promotional activities
- **Vital interests:** In exceptional circumstances, it may be necessary to process your personal information to protect your life

Who we share your personal information with

We will keep your personal information confidential at all times and only process it in accordance with this privacy notice.

We will only share your personal information for the purposes set out above within TrinityBridge on a ‘need to know’ basis. However, there are occasions where we have to share your personal information with third parties outside of these such as:

- Recruitment agencies and outsource providers
- Background and criminal check providers (including education, employment, financial and address history)
- Learning and training companies
- Fraud and financial crime detection/prevention agencies
- External consultants and appointed auditors including our legal advisers
- Occupational health providers or other medical professionals. If we require the health professional to share your Special Categories of Personal Data with us, we will seek your explicit consent at the time

- Regulators
- Your advisors (such as lawyers, professional advisors or Trade Unions), who you have given authority for us to share your personal information with or given authorisation to deal with us directly, for example, a power of attorney

Sometimes your personal information may be sent to other parties outside of the UK/Ireland and the European Economic Area (EEA) in connection with the purposes set out above. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Candidate Privacy Notice, and in doing so may rely on certain transfer mechanisms such as the Standard Contractual Clauses approved by the European Commission or International Data Transfer Agreements as approved by the UK Information Commissioner’s Office, as appropriate. If you would like further information, please contact HR Services.

How long we keep your information for

We will keep your personal information for the duration of the recruitment process. If you are successful in obtaining employment with us:

- The information above relating to criminal record and background checks will be deleted (unless we inform you otherwise) and we will simply keep a record that these checks were completed
- The other information which we need to keep in order to make further arrangements for my employment will be retained whilst my employment continues and will be held in accordance with our Employee Data Privacy Notice

If your application is unsuccessful, we may retain your information after this to respond to questions or complaints, to demonstrate we have treated you fairly, and for legal and compliance reasons. In any event, if your application is unsuccessful, we will not retain your information for any longer than six months (aside from criminal background checks which will be kept for no longer than is necessary).

Your rights

You have certain rights under data protection legislation, and you may submit the following requests:

- **Right of access:** This means we will provide you with a copy of the personal information we hold about you. This is an entitlement to a copy of the information only, you are not entitled to documents although these may be provided on occasion
- **Right of rectification:** This means if we hold any incorrect information about you, we will correct it

- **Right of erasure:** This means you can request we delete the information we hold about you. Please note, we may not be able to comply with this request in full where, for example, we have a legal or regulatory obligation to retain your personal information.
- **Right to restrict processing:** This means we will pause processing your personal data in certain circumstances, such as where you believe the information we hold is inaccurate and we are investigating these claims
- **Right to portability:** We will provide your or a third party an electronic copy of the personal information you have given us in a commonly used electronic format
- **Right to object:** This means you can object to us processing or holding your information. We may refuse a request where we can reasonably demonstrate legitimate grounds for continuing to use. We will not refuse an objection request which relates to marketing activity

Consent

In limited circumstances we may ask for your consent to process certain information. Where we do this, you have the right to withdraw your consent at any time. If you would like to withdraw your consent, please contact our HR Services team.

Automated decision making

We process your personal information in an automated way where this is necessary in relation to your recruitment, for example as part of our initial automated screening process.

If you do not agree with the result, you have the right to request that we perform a manual reassessment using the same information that you originally provided and any additional information you feel is relevant. If you wish to do so, please contact our HR Services team.

Wherever possible, we will respond within one month from receipt of the request, but if we don't, we will notify you of anticipated timelines ahead of the one-month deadline together with a brief explanation as to why we are unable to respond within the timeframe.

Please note that simply submitting a request doesn't necessarily mean we will be able to fulfil it in full on every occasion – we are sometimes bound by law which can prevent us from fulfilling some requests in their entirety, but when this is the case, we will explain this to you in our response.

If you have any concerns about the way in which your personal information is being processed by us, please contact our HR Services team in the first instance. Or you can contact the Head of Data Protection & Client Communications Compliance at DPO@trinitybridge.com or by writing to us at:

TrinityBridge

Data Protection & Client Communications Compliance team

Nelson House
Gadbrook Business Centre
Gadbrook Road
Northwich
CW9 7TN

We expect that any query you have regarding how your data is processed can be answered by our HR Services team or our Head of Data Protection & Client Communications Compliance.

If you are unsatisfied with their response, you have the right to complain to Information Commissioner's Office (ICO). You can do this online at ico.org.uk, by calling their helpline on 0303 123 1113 or writing to them at the following address:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Should you remain dissatisfied you also have the right to seek a judicial remedy.

Our Candidate Privacy Notice

If you have any queries regarding this privacy notice, please contact our HR services team or the Head of Data Protection & Client Communications Compliance and they will be happy to discuss any query with you. This privacy notice will be updated from time to time, and although we will endeavor to inform you of these changes, you should review it regularly.