

## Recruitment Privacy Notice

### Introduction

#### Scope of privacy notice

This Recruitment Privacy Notice explains the type of information we process, why we are processing it and how that processing may affect you.

#### Transfers of personal data outside the EEA

We may transfer your personal data outside the EEA to members of our group. Where necessary these transfers are covered by the intra-group transfer agreement and model clauses.

#### What do we mean by “personal data” and “processing”?

“Personal data” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

“Processing” means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “sensitive personal data”.

#### Your personal data

We process your data for the purposes of fulfilling our recruitment practices. Some of the personal data that we process about you comes from you. For example, you tell us your contact details. Other personal data about you is generated from references and third party companies such as recruitment agencies. Your personal data will be seen internally by managers, administrators and HR.

#### How long do we keep your personal data?

If you are successful in your application your data will be kept on your personnel file. If you are unsuccessful, your data will normally be destroyed twenty-four months after you have been informed that you were unsuccessful. Irrelevant data such as CCTV images may be deleted after a short period in line with our building management’s policy (where applicable).

#### Transfers of personal data outside the EEA

We may transfer your personal data outside the EEA to members of our group and other processors who provide us services in connection with the recruitment process. Usually, such data is processed within the EEA but also involves service providers in the USA and members of the Maven group that are situated in Hong Kong.

#### Contact details

In processing your personal data, we act as a data controller. Our contact details are as follows:

Dataprivacy@mavensecurities.com

#### Legal grounds for processing personal data

##### What are the grounds for processing?

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised certain grounds as Legal obligation and Legitimate Interests and outline what those terms mean below.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination and ensuring that work permits for non-EU candidates comply with local UK legislation.
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.

### **Processing sensitive personal data**

If we process sensitive personal data about you, as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies (see below), including that the processing is for equality and diversity purposes to the extent permitted by law.

In outline, these include:

- Processing being necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
- Processing relating to data about you that you have made public (e.g. if you tell colleagues that you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment and other related benefits, medical diagnosis, and assessment of your working capacity;
- Processing for equality and diversity purposes to the extent permitted by law.

### **Further information on the data we process and our purposes**

Examples of the data and the grounds on which we process data are in the table below. The examples in the table cannot, of course, be exhaustive.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or background checks and any information connected with your right to work in the UK. If relevant, we may also process information concerning your health, any disability and in connection with any adjustments to	Contract Legal obligation Legitimate interests

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
	working arrangement. We will also process, CVs, sound recordings (work phone lines are recorded), References, details of your work history, NI/social security numbers etc.	
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin	Contract Legitimate interests
Security	CCTV images, building access control data	Legitimate interests
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age	Legal obligation Legitimate interests

### **Who gets to see your data?**

Your personal data may be disclosed to managers, HR, third party screening and recruitment platforms and administrators for employment, administrative and management purposes as mentioned in this document. We may also disclose this to other members of our group.

### **Access to your personal data and other rights**

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

You also have a legal right to make a “subject access request”. If you exercise this right and we hold personal data about you, we are required to provide you with information, including a description of the personal data, and an explanation of why we are processing it.

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted.

We generally do not require consent, but in the case where we have specifically requested it as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

### **Complaints**

If you have complaints relating to our processing of your personal data, you should raise these with HR in the first instance. You may also raise complaints with the Information Commissioner who is the statutory regulator. For contact and other details ask HR or see: <https://ico.org.uk/ICO>.

### **Scope**

This notice does not form part of any contractual relationship between the Company and a job applicant. This notice can be changed at any time.