



CANDIDATE PRIVACY NOTICE

ABOUT THIS NOTICE

This Privacy Notice explains how BTP Group Limited collects and uses personal information about candidates for jobs during the course of the application and recruitment process, and afterwards. It explains how and why your personal data will be used, how long it will usually be retained for, and provides information that we are legally obliged to give you.

In this notice, we refer to “processing” and “personal data”. “Personal data” means information which identifies you and relates to you as an individual. “Processing” effectively means anything that we do with your personal data, including collecting, recording, storing, destroying, sending to third parties, and amending.

This notice also refers to “special categories” of personal data. These are special categories of more sensitive personal data, which require a higher level of protection, for example information about a person’s health or sexual orientation.

This Privacy Notice applies to candidates for employment, or any kind of engagement, with BTP Group Limited. BTP Group Limited of 48 Welbeck Street, London W1G 9XL is the relevant data controller in relation to the personal information we hold in connection with the application and recruitment process.

If you have any questions or concerns about this notice, or how we use personal information, please contact John Brennan, Director, email address: johnbrennan@btpgroup.com.

WHAT PERSONAL DATA DO WE PROCESS?

In connection with your application to work with us, and the recruitment process, we will process the following categories of personal information about you:

- The information you provided us in your curriculum vitae, covering letter and/or application form, including: name; title; address; telephone number; personal email address; date of birth; gender; job history; education history, including qualifications and degrees awarded.
- Information on your current and past compensation and benefits.
- Any information you provided during interviews.
- Interview notes.
- Information about the kind of role sought, desired salary and benefits, desired working hours and arrangements and location sought.
- Reference information and information gathered as part of background checks (including where background checks are performed by third parties).
- Right to work information, including copies of documents (for example, passport, driving license and utility bills).
- Details of professional memberships.
- Offer letters.
- Information gathered through our monitoring and/or recording of emails, IT systems, telephone systems, audio conferencing.

Most of the personal data that we process will be provided by you. However, your personal data may also be collected and provided to us by third parties, such as recruitment agencies, background check agencies, former employers, universities and other educational bodies, official and regulatory bodies, and medical professionals. If you are offered a contract of employment or engagement subject to satisfactory references and other conditions, we will ask such third party providers to collect and provide us with such data for vetting and verification. If we do not have this personal data, we may not be able to adequately consider your application for a role with us. We will only contact third parties in relation to vetting and references to verify your personal information if your application is successful and you have accepted a conditional offer of employment with us. You will be told, under these circumstances, that we are contacting such third parties.



WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS?

- Information about your physical and mental health.

WHAT WILL WE USE YOUR PERSONAL DATA FOR AND HOW WILL WE PROCESS IT?

We will only use your personal data when the law allows us to do so. In relation to the application and recruitment process, we will use your personal data so that we can take steps necessary to enter into a contract with you, whether as an employee, consultant or worker, to comply with legal obligations or otherwise in relation to our legitimate business interests. The main reasons we will process candidates' personal data are:

1. To identify and evaluate job applicants, including assessing skills, qualifications and experience.
2. Verifying candidate information and carrying out employment, background, and reference checks, and to prevent fraud.
3. Communicating with you about the recruitment process and your application.
4. To comply with our legal, regulatory, or other corporate governance requirements.
5. For the purposes of conducting data analytics to review and better understand the operation of our recruitment processes.
6. Where we need to use it to perform our obligations under your employment or engagement contract with us.

WHAT WILL WE USE SPECIAL CATEGORIES OF PERSONAL DATA FOR AND HOW WILL WE PROCESS IT?

Special categories of personal data require higher levels of protection. We will always treat special categories of personal data as confidential, and will only share it where we have a specific and legitimate need to do so. We have also implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure.

We may process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent. If we do this, we will give you full details of the information we would like, and the reason for this. It will not be a condition of your employment that you give your consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, for example, for equal opportunities monitoring.

We will only process special categories of personal data in the following ways:

Information about Health: we may process information about your physical or mental health in compliance with our obligations in connection with your employment or engagement. This may be so that we can:

- Process information about an individual candidate's physical or mental health to comply with our obligations to make reasonable adjustments for disabled employees/workers as part of the recruitment process;

WHEN WILL WE SHARE YOUR PERSONAL DATA?

We will only share your personal data with the following third parties for the purpose of processing your application and entering into an employment contract or contract of engagement with you, or where otherwise necessary to comply with a legal obligation or in pursuit of our legitimate business interests:

- External HR, financial, legal and other professional advisors;
- Recruitment agencies



All our third party service providers 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.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will only keep your personal data for as long as necessary to fulfil the purposes for which we collected it. This includes for the purposes of satisfying any legal, accounting, or reporting requirements. We may sometimes anonymise your personal data, so that you cannot be identified from the data, in which case we may use it without further notice to you.

For unsuccessful candidates, we will usually only keep personal data for a maximum of 12 months from the end of the application/recruitment process, subject to any exceptional circumstances and to comply with particular laws or regulations.

WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL DATA?

You will not be subject to hiring decisions based solely on automated data processing.

Under some circumstances you may:

- **Request access** to your personal data.
- **Request correction** of the personal information that we hold about you.
- **Request erasure** of your personal information where there is no good reason for our continuing to process it.
- **Object to processing** your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** your personal data. This means you can ask us to suspend the processing of personal information about you, if (for example) you would like us to establish its accuracy.
- **Request the transfer** of your personal data to a third party.

You also have the right to **withdraw consent**, in the limited circumstances under which you have been asked for and provided your consent to our processing your personal data.

You have the right to **raise any concerns** about how your personal data is being processed with the Information Commissioner's Office (ICO) by going to the ICO's website: <https://ico.org.uk> or contacting the ICO on 0303 123 1113 or casework@ico.org.

If you would like information on these rights, please speak to John Brennan, Director, email address: johnbrennan@btppgroup.com.