

Capp & Co Limited

Recruitment Privacy Notice

Effective from: 25 May 2018

1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. It is important that you read all of this Notice carefully as it sets out how Capp & Co Limited ("the Company", "we" or "us") handles your personal information when you apply for a job or other role with us and the rights you have in connection with that information. The term "applicants" is used in this Notice to refer to anyone who applies for a job role working with Capp & Co Limited, or who otherwise seeks to carry out work with or for us (whether on a permanent or non-permanent basis).

If you are in any doubt, or have any comments or questions about this Notice, please contact us using the contact details set out at Section 8 below.

2. Types of personal information we collect when you apply

Information that we collect automatically

You can visit the recruitment section of our website www.capp.co/work-for-us ("Website") and search for jobs without providing personal information. However, we do collect certain information automatically from your device when you visit our Website. For further information, please see the privacy notice that applies to the use of our Website www.capp.co/Privacy-Policy

Personal Information collected from you

The types of personal information we collect and process when you apply for a role with Capp & Co Limited may include (but is not limited to):

- Identification data and contact details – including your name, address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)).
- Employment history – such as previous employers and job titles/positions.
- Background information – such as academic/professional qualifications, job qualifications, education, details included in your CV/resumé (which might include details of any memberships or interests constituting sensitive personal information), transcripts and employment references.
- Details of your nominated referees (including their name, contact details, employer and job role).
- Details of your immigration/visa status.
- Previous applications/roles (information relating to previous applications you have made to the Company and/or any previous employment history with the Company).
- Other information you voluntarily provide throughout the process, including through online assessments, telephone or video interviews, assessment centres / exercises and face-to-face interviews.

As a general rule, during the recruitment process, we try not to collect or process any of the following: information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health/sex life ("Sensitive Personal Information"), unless authorised by law or where necessary to comply with applicable laws.

However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role. You may provide, on a voluntary basis, other Sensitive Personal Information during the recruitment process.

Personal information collected from other sources

- References provided by referees.
- Other background information provided or confirmed by academic institutions and training or certification providers.
- Criminal records data obtained through criminal records checks.
- Information provided by background checking agencies and other external database holders (for example credit reference agencies and professional / other sanctions registries).
- Information provided by recruitment or executive search agencies.
- Information collected from publicly available sources, including any social media platforms you use or other information available online.

(in each case, where permissible and in accordance with applicable law).

3. Purposes for processing personal information

We collect and use this personal information primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference checks or background checks (where applicable) and to generally manage the hiring process and communicate with you about it.

If you are accepted for a role at Capp & Co Limited, the information collected during the recruitment process will form part of your ongoing staff member record and will be processed in accordance with our Global Employee Data Privacy Notice.

If you are not successful, we may still keep your application for up to 12 months from the date of your application to allow us to consider you for other suitable openings within Capp & Co Limited in the future, unless you request that we delete your application.

4. How does Capp & Co Limited process my personal information?

We may process your personal information as follows:

- your name, email address and contact details may be used to manage our communications with you;
- any personal information you provide in relation to a disability may be used to provide reasonable adjustments to any assessment that we provide to you;
- any personal information you provide in relation to gender, ethnicity, age, social background or sexual orientation may be used for aggregate level analysis only to compare differences between groups;
- any responses you provide explicitly in response to an assessment question may be processed using automated decision making in relation to the scoring of the assessment, and in relation to your progression in a selection and recruitment process, but your personal information in relation to name, email address, gender, ethnicity, age, social background or sexual orientation will never be used as part of automated decision making.

Automated decision-making

In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. For example, we use automated decisions to calculate scores on our assessments and to determine your progression through a selection and recruitment process. We have implemented measures to safeguard the rights and interests of individuals whose personal information is subject to automated decision-making, including ensuring that it is only explicit assessment data (e.g. your responses to explicit assessment questions) that is used in automated decision making and never demographic personal information (e.g. your name, email address, gender, age, ethnicity, social background or sexual orientation).

When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contact us using the contact details provided under “Contact us” in section 8 below.

5. Who we share your personal information with and transfers abroad

We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

Transfers to other group companies

We will share your personal information with other members of the Company's Group around the world in order to administer our recruitment processes and store data.

Transfers to third party service providers

We may make certain personal information available to third parties who provide services relating to the recruitment process to us, including:

- recruitment or executive search agencies involved in your recruitment, e.g. Advento Staffing, Avanti Recruitment, Axica, Cedar Recruitment, Code Consult, Dawson & Walsh, MRL, Renovata, Saleslogic;
- background checking or other screening providers and relevant local criminal records checking agencies, e.g. KnowYourCandidate;
- data storage, shared services and recruitment platform providers, IT developers and support providers and providers of hosting services in relation to our careers website, e.g. Rackspace;
- third parties who provide support and advice including in relation to legal, financial / audit, management consultancy, insurance, health and safety, security and intel and whistleblowing / reporting issues, e.g. Corrigan, Fieldfisher, Royal London, Spencer Gardner Dickins.

We may also disclose personal information to third parties on other lawful grounds, including:

- Where you have provided your consent;
- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant;
- In response to lawful requests by public authorities (including for tax, immigration, health and safety, national security or law enforcement purposes);
- As necessary to establish, exercise or defend against potential, threatened or actual legal claims;
- Where necessary to protect your vital interests or those of another person; and/or
- In connection with the sale, assignment or other transfer of all or part of our business.

In some cases, the sharing described above may result in your personal information being transferred internationally, including from the European Economic Area to a country outside it. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our group companies, affiliated companies and third party service providers operate around the world. This means that when we collect your personal information we may process it in any of these countries. Typically, it may be the US where your data are processed if outside the EEA.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Notice. These include:

- reliance on the EU-US Privacy Shield (under Article 45 of the General Data Protection Regulation) in the context of personal data transfer to US third party processors.

5. Legal basis for processing personal information

Under European data protection law, our legal basis for processing your personal information as part of the recruitment process is:

- our legitimate interests (as summarised above in Section 3) (which are not overridden by your data protection interests or fundamental rights and freedoms, particularly taking into consideration the safeguards that we put in place, for example, those outlined in Section 4 above);

- to comply with applicable immigration and/or employment laws and regulations;
- to take steps prior to entering an employment contract with you, where you are considered for employment;
- in circumstances where you have made the data public;
- where we have your consent to do so. Where we have requested your consent to process your personal data, you have the right to withdraw your consent at any time;
- to protect the rights and interests of the Company, our employees, applicants and others, as required and permitted by applicable law.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided in Section 8 below.

6. Data retention periods

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally, this means your personal information will be retained:

- in accordance with the retention periods set out in the Company's Global Employee Data Privacy Notice, available from the shared X: drive (when you become our employee); or
- for a period of 12 months after confirmation that your application was unsuccessful, unless you request that we delete your application.

7. Your data privacy rights

You may exercise the rights available to you under applicable data protection laws as follows:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided below.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Our Data Subject Rights Management Policy is available for you to view www.capp.co/capp-policies

8. Contact details

Please address any questions or requests relating to this Notice to the Capp & Co Limited Finance/HR team (email: accounts@capp.co) or alternatively, you can raise any concerns with your hiring manager, local HR contact, or the Capp & Co Limited Data Protection Officer.

The Capp & Co Limited Data Protection Officer can be contacted here - by email: dpo@capp.co