

Recruitment Data Privacy Notice UK & GIBRALTAR



The Company is committed to protecting the personal data of anyone seeking employment with us. This Notice sets out how we collect and use your personal data. You should read this Notice carefully. If you have any questions, details of who to contact are listed at the end of the policy.

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What do we mean by personal information?

Personal Information means information about you as an individual, whether linked to your name or any other way in which you could be identified, such as your National Insurance number or home address. Certain types of personal information are considered to be special categories of information due to their more sensitive nature. Sometimes we will ask for or obtain special categories of information because it is relevant to your application. We will clearly highlight when the Company processes a special category of personal information, and provide our legal grounds for doing so.

Special categories of information: Information about your health, criminal convictions, genetic or biometric data, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.

What personal information do we collect?

As a potential employer, the Company will collect, use, and store your personal data for a wide variety of reasons in connection with the employment relationship. We've set out the main categories of candidate personal data which we process, and the stages we may process these, below.

Upon Application

Individual details: Your name, address, contact details (e.g. personal email/telephone number(s)), gender, marital status, date of birth, nationality

Identification information: Your passport, driving licence details, National Insurance details, and documents evidencing your right to work in the United Kingdom (including information about your immigration status when relevant)

Recruitment information: including CV, application form, references, professional memberships and qualifications, interview notes.

Once We Have Made You an Offer

Background vetting information (including **special category of personal information**)

Health Data: including information about a successful candidate's physical or mental health in compliance with our employment obligations, in particular to ensure we make reasonable adjustments to accommodate any personal conditions or illnesses.

Criminal Convictions Data: Given the regulated nature of our business, we ask future recruits to disclose their criminal record history, and we carry out criminal record checks as part of our background vetting process and in compliance with our employment obligations.

Upon recruitment, the Company will conduct a Standard criminal record check with the Disclosure and Barring Service (DBS) for employees undertaking regulated roles: for all other employees the Company will conduct a Basic check with the DBS. During the course of employment the Company will repeat these checks from time to time.

Banking information: Your bank account details

Credit and identity checks: including unsatisfied County Court Judgments.

Upon Your Acceptance of Our Offer

Once you have accepted our offer and our checks are complete, we will ask you to read our Employee Privacy Notice. **Remember, you can ask to see this Notice at any point throughout the recruitment process.**

The majority of the personal data provided by you is mandatory in order for us to administer the employment relationship and / or comply with statutory requirements relating to immigration or taxation. Failure to provide mandatory personal data may affect our ability to accomplish the purposes stated in this Notice and potentially affect any offer of employment.

The list set out above is not exhaustive, and there may be other personal data which the Company collects, stores and uses in the context of the future employment relationship. We will update this Notice from time to time to reflect any notable changes in the categories of personal data which we process.

In limited circumstances your personal data may be provided by third parties, such as former employers, official bodies (such as regulators or criminal record bureaus), medical professionals, recruitment agencies, governmental bodies (e.g. HMRC, the Department for Work and Pensions (DWP) and / or professional regulators, e.g. the Financial Conduct Authority) and/or other companies within the group.

What will we use your personal information for?

We will only process your application data for the purpose of establishing suitability for a role with the Company. When processing your data, we must have a legal basis for doing so. Our legal basis in this instance is that the processing is necessary in order for us to take steps to perform a proposed contract of employment with you.

Where we process special categories of personal information, we will do so on

the basis of that this processing is necessary for the purposes of carrying out the Company's obligations and exercising specific rights in the field of employment.

If your application is successful, you will need to read the Employee Privacy Notice, which provides full details on how we collect, use and store employee data.

When do we share successful candidate personal data?

The Company will only share your personal data with other parties in limited circumstances and where this is necessary for the performance of the employment contract or to comply with a legal obligation, or otherwise in pursuit of its legitimate business interests as follows:

- ▶ Firms who assist with recruitment and vetting (recruitment firms, background vetting specialists)
- ▶ Government agencies and bodies (e.g. HMRC and/or the DWP)
- ▶ Professional regulators (the Financial Conduct Authority, the Prudential Regulation Authority, the Gibraltar Financial Services Commission, and The Pensions Regulator).

Where possible, we will ensure that successful candidate personal data is shared under the terms of a written agreement between the Company and the third party which includes appropriate security measures to protect the personal data in line with this Notice and our obligations. The third parties are permitted to use the personal data only for the purposes which we have identified, and not for their own purposes. They are not permitted to further share the data without our express permission.

How do we protect your information?

We have 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 prevent unauthorised electronic access to servers by use of suitable firewalls and network security measures. We use strong internal antivirus

and malware monitoring tools and conduct regular vulnerability scans to protect our internal infrastructure and also to protect communications we may send you electronically. Our servers are located in secure datacentres that are operated to recognised industry standard. Only authorised people are allowed entry and this is only in certain situations.

- ▶ We ensure that only authorised persons within our business have access to your data and conduct regular checks to validate that only the correct people have access. We promote responsible access to data and segregate who can see what data within the organisation.
- ▶ We have password policies in place which ensure passwords are robust and are changed regularly.
- ▶ We use secure email exchange where necessary and have monitoring on all email we send and receive.
- ▶ We schedule periodic checks of all security measures to ensure they continue to be efficient and effective, taking into account technological developments.

In respect of **special categories of information**:

- ▶ We will always treat information about health as confidential and it will only be shared internally or with specialist providers where there is a specific and legitimate purpose to do so
- ▶ We will always treat criminal record history as confidential and it will only be shared internally where there is a specific and legitimate purpose to do so.

How long is my personal data kept for?

The Company will retain personal data only for as long as needed to fulfil the purpose(s) for which it was collected, or otherwise as required under applicable laws and regulations. Under some circumstances we may anonymise your personal data so that it can no longer be associated with you.

If you are successful in your application for employment with the Company the data we have collected will be transferred to your personal file. If you are unsuccessful in your application for employment, we will typically retain data for the following periods:

Type of data	Retention Period (all subject to exceptional circumstances and/or to comply with particular laws or regulations):
Individual details	6 months
Identification information	6 months
Recruitment information	6 months
Background Vetting information	6 months
Criminal Record Information	6 months

If you wish for your personal data to be retained in anticipation of any future employment opportunities we will only do so with express written consent from the applicant.

What are my rights in relation to my personal data?

The Company will always seek to process your personal data in accordance with its obligations and your rights.

You will not be subject to decisions based solely on automated decision making without your prior consent.

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data. You also have the right to request the transfer of your personal data to another party in a commonly used format. If you have any questions about these rights, please contact the Data Protection Officer using the details set out below.

You have a separate right of access to your personal data processed by the Company. You may be asked for information to confirm your identity and/or to assist the Company to locate the data you are seeking as part of the Company's response to your request. If you wish to exercise your right of access you should set out your request in writing to the Data Protection Officer using the details provided below.

Finally, 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/concerns/> or contacting the ICO on 0303 123 1113 or casework@ico.org.uk.

Where I can get further information?

The Company has appointed a Data Protection Officer to oversee compliance with this Notice and to deal with any questions or concerns:

Employer	The Data Controller is...	DPO	Contact Details
InsureThe Box	InsureThe Box Ltd (Company No. 102568), Montagu Pavilion, 8-10 Queensway, Gibraltar	<input type="checkbox"/>	The Data Protection Officer, Aioi Nissay Dowa Insurance Management Ltd, 7th Floor, 52-56 Leadenhall Street, London, EC3A 2BJ
AND-E	Aioi Nissay Dowa Insurance Management Ltd (Company No. 01878208) OR Aioi Nissay Dowa Europe Ltd (Company No. 11054298)	<input type="checkbox"/>	dpo@aioinissaydowa.eu (Please mark in the subject line that this is an employee request)

Recruitment Data Privacy Version:

This Notice was last updated on 18.05.2018. The Company will update this Notice from time to time to reflect any notable changes in the purposes for which it processes your personal data.