

Recruitment privacy notice

Introduction

Ecclesiastical Insurance Office plc (the Company) is committed to protecting the personal data of its job applicants. This Notice sets out important information about how the Company collects and uses your personal data during the course of the recruitment process.

You should read this Notice carefully and raise any questions you may have with the HR team or Data Protection Officer.

Scope

This Notice applies to job applicants based in the UK. In connection with your application for employment, the relevant data controller is Ecclesiastical Insurance Office plc (company number 00024869) whose registered office is Benefact House, 2000 Pioneer Avenue, Gloucester Business Park, Brockworth, Gloucester, GL3 4AW.

What personal data do we collect?

Personal data means information which identifies you and relates to you as an individual. As a prospective employee, the Company will collect, use and store your personal data for a wide variety of reasons in connection with the application and recruitment process. We have set out below the main categories of candidate personal data which we process in connection with our recruitment activities:

- personal contact information (including your name, home address, personal telephone number(s) and personal e-mail address)
- date of birth
- gender
- work history and other relevant experience including information contained in CV, cover letter or job application form
- education information including degrees awarded, transcripts and other information provided in support of the job application
- pay/compensation history
- information collected during phone screenings and interviews
- details regarding the type of employment sought, desired salary, willingness to relocate and job preferences
- reference information and information received from background checks (where applicable) including information provided by third parties
- information related to previous applications to us or previous employment history with us
- documents evidencing your right to work (including information about your immigration status where relevant)
- information gathered through the Company's monitoring of its IT systems, building access records and CCTV recording in relation to your communications with us and attendance at our premises
- any photograph that you have provided

- any other personal data which you have provided, for example when accessing the Company's website or recorded telephone lines

The majority of the personal data to be provided by you is mandatory in connection with our recruitment activities. Failure to provide mandatory personal data may affect our ability to accomplish the purposes stated in this Notice, including considering your suitability for employment and/or entering into an employment contract with you.

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 recruitment process. We will update this Notice from time to time to reflect any changes in the categories of personal data which we process.

Most of the personal data which we process will be collected directly from you. In limited circumstances we may get your personal data from third parties, such as former employers, official bodies (such as regulators or criminal record bureaus), medical professionals and/or credit reference agencies.

How do we use your personal data?

The Company uses your personal data for a variety of purposes in order to take steps necessary to enter into an employment contract with you, to comply with legal obligations or otherwise in pursuit of its legitimate business interests. We have set out below the main purposes for which candidate personal data is processed:

- to identify and evaluate job applicants, including assessing skills, qualifications and experience
- verifying candidate information and carrying out employment, background and reference checks where applicable and in order to prevent fraud
- communicating with you about the recruitment process and your application
- to comply with our legal, regulatory, or other corporate governance requirements
- for the purposes of conducting data analytics to review and better understand the operation of our recruitment processes

In addition to using your personal data to consider you for the role you applied for, we will retain and process your personal data to inform you about and to consider you for other roles that may be appropriate for you. If you do not want us to consider you for other roles which we consider may be appropriate for you, please inform us using the contact details set out above.

Again, this list is not exhaustive and the Company may undertake additional processing of personal data in line with the purposes set out above. 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.

Referencing and background checking

As part of our referencing and checking procedures, we will contact certain third parties in order to verify your personal information (including personal information that you provide as part of the application and recruitment process). These third parties will include:

- former employers in order to verify your previous employment history

- universities and/or other establishments for higher education that you attended in order to verify your education history
- search providers in order to verify your credit and sanctions status
- in order to establish whether you are detailed on the consolidated sanctions list
- The Disclosure and Barring Service in order to establish any criminal record

We will only seek this information in relation to successful candidates that have accepted a conditional offer of employment with us and we will specifically inform such candidates that we will be contacting these third parties in advance of doing so.

What special categories of personal data do we process?

Certain categories of data are considered "special categories of personal data" and are subject to additional safeguards. The Company limits the special categories of personal data which it processes as follows:

- **Health Information**

The Company may process information about an applicant's physical or mental health in compliance with its obligations in connection with employment, in particular (i) to comply with obligations owed to disabled employees, for example the obligation to make reasonable adjustments as part of the recruitment process; and (ii) to verify your fitness for a particular job role.

We will always treat information about health as confidential and it will only be shared internally in connection with the recruitment process where there is a specific and legitimate purpose to do so. 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.

If a candidate is successful, any health information processed as part of the recruitment process that is relevant to the Company's ongoing compliance with its obligations in connection with employment will be retained and processed in accordance with the Company's Employee Privacy Notice.

If a candidate is unsuccessful, any health information obtained as part of recruitment process will be deleted with the rest of the candidate's personal data within 12 months of their rejection.

- **Criminal Record Information**

Given the nature of our business, we ask all new employees disclose their criminal record history and we carry out criminal record checks as part of our background checking process in compliance with our obligations in connection with employment. In particular:

- we will conduct a standard criminal record check via the Disclosure Barring Service (DBS) for all employees employed to carry out an approved persons role under the Senior Insurance Managers Regime
- we will conduct a basic criminal record check via the DBS for employees in all other roles

For regulated roles, the criminal record checks may be repeated periodically during the course of employment in accordance with our regulatory obligations.

We will always treat criminal record history as confidential and it will be shared internally only where there is a specific and legitimate purpose to do so. 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.

Criminal record information will be deleted once the applicable checks have been completed subject to any exceptional circumstances and/or to comply with particular laws or regulations. Criminal record information will typically be retained for a maximum of 6 months, although for successful candidates the outcome of any check will remain on the employee's record.

- **Equal Opportunities Monitoring**

The Company is committed to providing equal opportunities for employment for its job applicants and from time to time it will process information relating to ethnic origin, race, nationality, sexual orientation and disability, alongside information relating to gender and age, for the purposes of equal opportunities monitoring.

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, this monitoring will always take place in accordance with appropriate safeguards as required under applicable law, including:

- the provision of information relating to ethnic origin, race, nationality, sexual orientation and disability for the purposes of monitoring will be voluntary and processed for this purpose only with your consent;
- wherever possible, the monitoring will be conducted on the basis of using anonymised data so individual job applicants cannot be identified;
- the information processed for monitoring purposes will be maintained separately from general recruitment records.

When do we share candidate personal data?

The Company will share candidate personal data with other parties only in limited circumstances in order to take steps necessary to enter into the employment contract or where necessary to comply with a legal obligation, or otherwise in pursuit of its legitimate business interests as follows:

- recruitment agencies
- background checking specialists
- occupational health providers
- HMRC and/or any other applicable government body
- accountants, lawyers and other professional advisers

- the Financial Conduct Authority and/or the Prudential Regulatory Authority and/or any other applicable regulatory body

Wherever possible, the 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, and they are not permitted to further share the data without our express permission.

For how long will my personal data be retained?

The Company's policy is to 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. We reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you.

If you are successful in your application and accept an offer of employment with us, the personal data we collected during the application and recruitment process will become part of your employment record where appropriate, and we will retain it in connection with your employment in accordance with the Company's Employee Privacy Notice.

For unsuccessful candidates:

- We will typically retain personal data collected during the recruitment process for a maximum period of 12 months from the end of the process subject to any exceptional circumstances and/or to comply with particular laws or regulations.
- We may retain select data relating to particular candidates on file for a longer period than 12 months and up to a maximum of 24 months in order to follow up with the candidates in relation to future vacancies; if you do not wish for your personal data to be maintained on file for this purpose, please inform us.
- We will typically retain personal data held in archived e-mails or other electronic files indefinitely.

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.

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 set out 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, or contacting the ICO on 0303 123 1113 or casework@ico.org.uk. The ICO's website is <https://ico.org.uk/concerns/>.

Where can I 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. If you would like further information about the matters set out in this Notice, please contact the Company's Data Protection Officer on 01452 528190 or email compliance@ecclesiastical.com.