

PrimaryBid Limited – Privacy Notice for Job Applicants

PrimaryBid Limited, its subsidiaries and affiliates ("**PrimaryBid**", "**we**", "**our**" or "**us**") respect the privacy of the individuals whose personal data we collect, including job applicants ("**you**" or "**your**").

This privacy notice (the "**Privacy Notice**") provides information, for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as it forms part of domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 ("**UK GDPR**"), the UK Data Protection Act 2018 ("**DPA**") and other applicable national data protection laws, concerning how PrimaryBid processes and protects your personal data that we may receive as part of your registering and interactions with PrimaryBid.

The terms "**controller**", "**processor**", "**data subject**", "**personal data**", "**process**", "**processes**" and "**processing**" used in this Privacy Notice have the meanings given to them in the UK GDPR.

Controllershship

PrimaryBid is an independent 'controller' in respect of its processing of your personal data. We are responsible for ensuring that we hold and use your personal data in compliance with the UK GDPR and the DPA and other applicable national data protection laws.

The personal data we collect about you

We collect information about you in the course of the recruitment process. Some of this information is collected directly from you (for example, in CVs, resumes or in forms that you are asked to complete). Other information is generated automatically when you use, or otherwise interacts with our systems (for example, when logging in to our network or sending an email which is retained in our systems); created by our staff (for example, in the interview and assessment process); or provided to us by third parties (for example, recruitment agencies, when a former employer provides a reference or educational institutions, consumer credit information agencies, law enforcement agencies when we conduct background and criminal record checks) or obtained from publicly accessible sources such as the internet and professional portals such as LinkedIn.

The information we collect about you includes but is not limited to:

- name, date of birth / age, gender, business and personal contact (including emergency contact) information, photograph, national insurance number or equivalent and passport or identity card number and other details;
- citizenship and, where relevant, residency and work permit status and other immigration-related information;
- relevant information regarding health and disabilities;
- content of references obtained;
- employment history;
- education history;

- qualifications;
- results of background checks including information in relation to criminal convictions;
- information regarding current salary, pensions, insurance and other benefits (including bank account details); and
- information relating to social media footprint.

We will tell you, when we ask you to provide information about yourself, if provision of the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary and you can, if you wish, decline to provide the information. Otherwise you should assume that we need the information for our business, human resource management or compliance purposes, and that you are therefore required to provide it. Refusal to provide information requested could result in us being unable to progress the recruitment procedure any further. If you are uncertain as to our need for information that we request from you, please contact careers@primarybid.com

Sensitive data

Some of the categories of personal data processed by us are treated as particularly sensitive.

This may include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data or data concerning sexual orientation (collectively known as 'special categories of personal data').

In accordance with applicable law we may also collect personal data relating to criminal convictions and offences where appropriate for the purposes of background checks relating to your application.

The purpose for processing your personal data

We will use your personal data for legitimate business, human resource management and compliance purposes and to perform our legal obligations, including:

- to manage the recruitment process;
- to assess your suitability for employment and to whom to offer a job;
- to determine the terms upon which to engage you;
- for recruitment statistics;
- to check entitlement to work in the UK;
- to respond to and defend legal claims;
- to assess the need to make reasonable adjustments for applicants with disabilities;
- to carry out human resource and legal / regulatory compliance functions;

- to carry out background checks;
- to ensure our and your compliance with law and regulation (e.g. eligibility to work in a particular country); and
- to verify information provided by you during the recruitment process.

What is the legal basis of the processing?

We are entitled to use, disclose and otherwise process the personal data described in this notice because we need to do so for the purposes set out above. Some of our processing may also be required so that we can comply with our legal obligations. We do not generally rely on **consent** to collect, use or otherwise process personal information other than in circumstances where our processing is genuinely optional – in those circumstances we will ask for consent on a case-by-case basis.

This means that when we process your personal data, we are mainly relying on:

- Article 6(1)(f) UK GDPR to the extent such processing is necessary for the purposes of the legitimate interests we pursue where we have concluded that our processing is not overridden by your interests or fundamental rights or freedoms that require the protection of personal data. Examples of this may be to assess whether you are a suitable level of qualification for a role.
- Article 6(1)(c) UK GDPR to the extent processing is necessary for compliance with a legal obligation to which PrimaryBid is subject. Examples of this may include fulfilling additional background checks where required to do so by a regulator.
- Article 9(2)(b) UK GDPR in connection with special category data where it is necessary for carrying out rights and obligations under employment law. Examples of this may include checks to establish that you have the right to work in the UK.
- Article 9(2)(g) UK GDPR in connection with special category data where processing is necessary for reasons of substantial public interest (Article 9(2)(g)).

Who will your personal data be shared with? / Who are the recipients of your personal data?

We may share your personal data internally for the purpose of the recruitment exercise. This includes: Members of HR, the recruitment team, interviewers, managers in the business area where the vacancy is; IT staff.

In addition, we may disclose your information, where reasonably necessary for the various purposes set out above, to:

- payroll administrators;
- employee benefits advisers;
- other service providers processing information on our behalf in the course of supporting our business and operations;

- third parties responsible for carrying out occupational health checks, background checks and criminal record checks;
- former employers for the purposes of obtaining references;
- third parties to whom we are required to disclose information by law or regulatory requirement; and
- competent regulatory and prosecuting authorities.

Any such transfers will be in compliance with our obligations as a controller under the UK GDPR, the DPA and other applicable national data protection laws. Some of these persons may process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data.

The disclosures described in this Privacy Notice may involve transferring your personal data to countries outside the UK and EEA which may not have similarly strict data privacy laws. When this occurs, we will ensure that any such transfers are carried out in compliance with applicable law, including, where necessary, being governed by data transfer agreements designed to ensure that your personal data is protected, on terms approved for this purpose by the UK or EU.

Retention and deletion of your personal data

We intend to keep your personal data accurate and up to date and, as a general principle, we do not retain your personal data for longer than we need it (except in anonymised / statistical form). We will retain information about you throughout the recruitment process. We will delete or anonymise any information that we hold about you when it is no longer required for the purposes set out above, or where longer, such period as is required or permitted by law or regulatory obligations which apply to us. Specific information about our record retention policies is available on request. Please contact us (see below).

If you receive and accept an offer of employment, personal data gathered during the recruitment process will be retained during your employment for purposes connected to the employment. Relevant information about how your data will be held will be notified during the on-boarding process (and updated from time to time in the course of your employment).

If an application is unsuccessful, we will retain your personal data on file for a period of 6 months so we can contact you if there are future job opportunities for which you may be suited.

Automated decision-making techniques

We do not envisage your personal data will undergo any automated decision making.

Your rights in relation to your personal data

The GDPR and other applicable laws provide you (as the data subject) a number of absolute or qualified legal rights in relation to the processing of your personal data. These rights include (with some exceptions):

- the right to know what personal data we process and a right of access to such personal data;
- the right to request any incomplete or inaccurate personal data to be corrected;
- the right to object to our processing of your personal data;
- the right to require us to delete your personal data in some limited circumstances;
- the right to object to our processing of some or all of your personal data on grounds relating to your particular situation which are based on legitimate interests, at any time (and require such personal data to be deleted). If you object, we shall no longer process such personal data unless we can demonstrate compelling legitimate grounds for such processing which override your interests, rights and freedoms or where it is necessary for the establishment, exercise or defence of legal claims; and
- a "data portability" right to require us to transfer your personal data to you or to a new service provider in a structured, commonly used and machine-readable format.

If you wish to exercise any of the rights referred to above, please contact us using the details set out under "**Contacting Us**" below.

We review and verify data protection rights requests. We apply non-discriminatory principles when we action requests relating to your data, in accordance with applicable data protection laws and principles.

We exercise particular care when receiving a request to exercise these rights on your behalf by a third party. We will ensure that the third party is correctly authorised by you to receive the requested information on your behalf.

If you wish to exercise any of these rights, please contact us (see **Contacting Us** below). You can also lodge a complaint about our processing of your personal information with the office of the UK Information Commissioner (<http://www.ico.gov.uk/>).

When exercising any of these rights, we may request specific information from you to prove your identity to our satisfaction so that we can safeguard your personal data from unauthorised access by someone impersonating you.

Contacting Us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data, or to exercise any of the rights listed above, please address questions, comments and requests to our Data Protection Officer at privacy@primarybid.com.

Changes to this policy

Any changes we make to this Privacy Notice in the future will be posted to our website at <https://primarybid.com/home/>.

This Privacy Notice was last updated on 17 January 2024.