



CREDITSAFE RECRUITMENT PRIVACY NOTICE



Version Control

This document uses the version control history. A draft document is shown as v0.1, v0.2, v0.3 etc. A released document is shown as v1.0, v2.0, v3.0 etc. Major amendments increment the first number, minor increments increment the second.

Version	Date	Author	Amendment
V0.1	10/05/2022	Matthew Lamb	Created Version
V1.0	19/05/2022	Matthew Lamb	Implemented
V1.0	29/09/2022	Estelle Hugon	Reviewed
V1.1	10/10/2023	Matthew Lamb	Annual review

This privacy notice only applies to your use of this website. To see how we process other types of data, including the data used in our products and services, please see the Transparency Statements, which are also available at the bottom of the home page, or click here;

<https://www.creditsafe.com/gb/en/legal/transparency-notice/transparency-notice-business-information.html>

The protection of your personal information is of paramount importance to us. We will use data that you choose to provide or that is being collected through your use of the website and which can identify you, only in line with the provisions of this Online Privacy Statement and in accordance with applicable data protection regulations.

This Online Privacy Statement sets out the type, scope and purpose of collecting, processing and using personal information you choose to provide when visiting and /or which may be transmitted via the Creditsafe website <https://careers.creditsafe.com/> (hereinafter "our website"). Please note that the use of our website does not require you to provide any personal information, unless you apply for a role within Creditsafe.

Personal identifiable information means any information on the basis of which an individual (the data subject) can be identified such as e.g. name, email address, phone number or the like. For more information on your rights of access, rectification and erasure of any personal data that we may hold about you, how to exercise these rights, and our contact details, please see the information at the bottom of this Privacy Notice.



For the purpose of the UK General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (hereinafter collectively referred to as “Data Protection Laws”), the data controller is either **Creditsafe Business Solutions Limited** of Bryn House, Caerphilly Business Park, Van Road, Caerphilly, or **Creditsafe Services Ltd** of Caspian Point One, Pierhead Street, Cardiff, CF10 4DQ (hereinafter “Creditsafe” or “we”, “us”) depending on the location of the role you are applying for.

Our supervisory authority for data protection purposes is the Information Commissioner’s Office (ico.org.uk). If you believe that we have processed your personal data in breach of this Online Privacy Statement or the relevant laws and regulations, you have the right to lodge a complaint with the Information Commissioner’s Office.

This Online Privacy Notice does not cover other websites with their own Online Privacy Notices. We encourage you to read the Online Privacy Notices on any other websites you visit.

By visiting our website you are accepting to the practices described in this privacy notice.

Purpose and lawful basis for processing

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010, the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA2018 which again relates to processing for employment purposes.

For some roles we may process information about applicant criminal convictions and offences. The lawful basis we rely on to process this data are Article 6(1)(f) legitimate interests and Schedule 1 part 1(1) of the DPA2018 which relates to processing for employment purposes.

What will we do with the information you give us?

We’ll use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.



We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your application. We may also contact you to request your feedback about our recruitment process. We'll use the other information you provide to assess your suitability for the role.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it may affect your application if you don't.

We will use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

Application stage

You can submit your application to us without the need to create an account. To access a copy of your application you can create an account or email us at shelley.moore@creditsafe.com

We ask you for your personal details including name and contact details. We'll also ask you about previous experience, education, referees and for answers to questions relevant to the role. Our recruitment team will have access to all this information.

Shortlisting

Our Talent Acquisition Partner in conjunction with the Hiring Manager will shortlist applications for interview.

Assessments

We may ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; attend an interview; or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by us.

If you are unsuccessful after assessment for the role, we may ask if you would like your details retained in our talent pool. If you say yes, we will proactively contact you should any further suitable vacancies arise.



Conditional offer

If we make a conditional offer of employment, we'll ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We must confirm the identity of our staff and their right to work in the United Kingdom, and seek assurance as to their trustworthiness, integrity and reliability.

You must therefore provide:

- proof of your identity – you will be asked to attend our office, or participate in a video call whilst the law permits, with original documents; we'll take copies.
- proof of your qualifications – you will be asked to attend our office, or participate in a video call whilst the law permits, with original documents; we'll take copies.
- a criminal records declaration to declare any unspent convictions.
- dependant on the role you are applying for, you may be asked to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.

We'll contact your referees, using the details you provide in your application, directly to obtain references.

We'll also ask you to complete a questionnaire about your health to establish your fitness to work.

We'll also ask you about any reasonable adjustments you may require under the Equality Act 2010. This information will be shared with relevant Creditsafe staff to ensure these are in place for when you start your employment.

Some roles require a higher level of security clearance – this will be clear on the advert or job description (or both). These checks include an ID check, DBS Check, PEP & Sanctions Check and an Adverse Financial Information check.

We use Know Your People to conduct our background checks. They will tell us the outcome of your background checks. If there are concerns about the results of the background checks, we may need to review your suitability for the role, or how you will perform your duties.

Our Company Policies requires all staff to declare if they have any potential conflicts of interest, or if they are active in a political party. If you complete a declaration, the information will be held on your personnel file.

You will also need to declare any secondary employment.

If we make a final offer, we'll also ask you for information including, but not limited to, the following:

- bank details – to process salary payments



- emergency contact details – so we know who to contact in case you have an emergency at work

We will provide an Employee Privacy Notice when you start your employment with us, which details all the relevant information about the processing of your personal data.

Criminal Conviction Data

We will collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. We use criminal conviction data to determine your suitability, or your continued suitability, for the role.

Secondments

We also offer opportunities for people to come and work with us on a secondment basis. We accept applications from individuals or organisations who think they could benefit from their staff working with us.

Applications are sent directly to us. Once we have considered your application, if we are interested in speaking to you further, we'll contact you using the details you give.

We may ask you to provide more information about your skills and experience or invite you to an interview.

If we do not have any suitable work at the time, we'll let you know but we may ask if you would like us to retain your application so that we can proactively contact you about possible opportunities in the future. If you say yes, we'll keep your application for six months.

If you are seconded to us, you will be expected to adhere to a confidentiality agreement and code of conduct, which will be agreed with your organisation.

How long is the information kept for?

For unsuccessful candidates the information about you is deleted immediately, unless you have requested that we retain it for future roles.

For successful candidates you will have access to the Employee Privacy Notice and Retention Schedule once you start with Creditsafe.

How we make decisions about recruitment

Final recruitment decisions are made by hiring managers and members of our recruitment team. We take account of all the information gathered during the application process.



Any online testing is marked and a result is generated automatically. However, if you wish to challenge the mark you have received, the result can be checked manually.

You can ask about decisions on your application by speaking to your contact in our recruitment team or by emailing shelley.moore@creditsafe.com.

Automated Decision Making

Automated decision-making means making decision about you using no human involvement, e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your Rights

You have the following rights in relation to the personal data we hold on you:

- the right to be informed about the data we hold on you and what we do with it;
- the right of access to the data we hold on you. More information on this can be found in our separate policy on Data Subject Rights Requests;
- the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- the right to have data deleted in certain circumstances. This is also known as 'erasure';
- the right to restrict the processing of the data;
- the right to transfer the data we hold on you to another party. This is also known as 'portability';
- the right to object to the processing of your personal data;
- the right to regulate any automated decision-making and profiling of personal data.

Candidates should note that exercising some of the above rights may interrupt the normal processing of your personal data; you will be informed if this would affect you materially.

Consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

Do we use any data processors?

Yes – we use one processor to provide elements of our recruitment service for us.



We use **Know Your People** to conduct background checks on successful candidates.

Who We Share Your Data With?

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons:

- For the administration of Payroll
- For the administration of HR records and related processes
- For training purposes

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us.

We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the EU.

Protecting Your Data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Please refer to the Information Security Policy.

Contact Address of the Controller

If you have any comments or questions regarding this Online Privacy Statement or our use of your personal information, or would like to make a request, please contact us at:

Creditsafe Services Limited
Caspian Point One,
Pierhead Street,
Cardiff
CF10 4PH



E-Mail: help@creditsafeuk.com

Website: <https://www.creditsafe.com/gb/en.html>

Telephone: 02920 886 500

Contact Address of the EU Representative

In accordance with Article 27 of the GDPR we have appointed an EU representative. The contact information is as follows:

Creditsafe Ireland Limited

Block B Joyce's Court,

Talbot Street,

DUBLIN 1

E-Mail: eudpo@creditsafe.com

Website: <https://www.creditsafe.com/ie/en.html>

Telephone: 01 898 3200

Making A Complaint

If you think your data rights have been breached, you are able to raise a complaint either with the Chief Human Resources Officer, or with the Information Commissioner (ICO).

You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

Data Protection Compliance

Our appointed compliance officer in respect of our candidate and employee data protection activities is the Chief Human Resources Officer.