

RECRUITMENT DATA PRIVACY NOTICE (UK)

1. INTRODUCTION

- 1.1 CPPGroup plc and our associated companies (including Card Protection Plan Limited, Homecare Insurance Limited and CPPGroup Services Limited ("**Company**", "**we**", "**us**" and "**our**") hold and process data on all applicants, ("**you**" or "**your**").
- 1.2 We take your data protection rights and our legal obligations seriously. Your personal data will be treated in a secure and confidential manner and only as set out below or otherwise notified to you in writing.
- 1.3 The following Data Privacy Notice describes the categories of personal data we may process within all Group companies. It also describes how your personal data may be processed, for what purposes we process your data and how your privacy is safeguarded during our relationship with you. It is intended to fulfil our obligations to provide you with information about the Company's processing of your personal data under privacy laws.
- 1.4 If you have any questions about this Data Privacy Notice or would like to access the information it contains in a different format please contact the Global Head of People Projects & Governance.
- 1.5 If you have any questions regarding the processing of your personal data or if you believe your privacy rights have been violated, please contact the Group Data Protection Officer. If you are aware of an unauthorised use or disclosure of data, please refer to the Group Data Protection Officer for guidance as to the applicable reporting requirements. The Group Data Protection Officer can be contacted by email: dataprivacy@cpp.co.uk

2. PROCESSING OF PERSONAL DATA

- 2.1 The Company collects and processes your personal data for the purposes described in this Data Privacy Notice.
- 2.2 The Company or relevant associated company of the Company identified in your recruitment process will be the data controller of your personal data. In addition, where processing of personal data is undertaken by other associated companies of the Company for their own independent purposes, these associated companies may be controllers of your personal data. These companies include CPPGroup plc, CPPGroup Services Limited, Card Protection Plan Limited and Homecare Insurance Limited.
- 2.3 We have a Data Protection Officer ("**DPO**") who is responsible for compliance with data protection law. You may contact the Company's Data Protection Officer securely and confidentially at any time if you have any concerns about the processing of your personal data or any data protection issue. The DPO's contact details are Paul Skelding, Group Head of Data Management and Data Protection Officer. Email: dataprivacy@cpp.co.uk.

3. WHAT DATA DO WE PROCESS?¹

- 3.1 We may collect various types of personal data about you for the purposes described in this Data Privacy Notice including:
 - 3.1.1 **Personal details:** including your title, name, nationality, personal contact details, immigration and eligibility to work information, driving licence, gender.
 - 3.1.2 **Recruitment and selection data:** skills/experience, qualifications, references, CV, application, interview and assessment data, vetting and verification information (eg results of credit reference check), right to work verification, information related to the outcome of your application, details of any offer made to you;

- 3.1.3 **Regulatory data:** records of your registration with any applicable regulatory authority, your regulated status and any regulatory certificates and references;
 - 3.1.4 **Monitoring data (to the extent permitted by applicable laws):** closed circuit television footage.
 - 3.1.5 Any other personal data which you choose to disclose to us during the recruitment process whether verbally or in written form (e.g. by email);
- 3.2 Certain additional information may be collected where this is necessary and permitted by local applicable laws.

4. HOW DOES THE COMPANY COLLECT DATA?

- 4.1 The Company collects and records your personal data from a variety of sources, but mainly directly from you. You will usually provide this information directly to the Recruiting Manager or local People contact.) Your participation in recruitment processes or emails you send or through verbal information which may be recorded electronically or manually.
- 4.2 In some circumstances, data may be collected indirectly from monitoring devices or by other means (e.g. building and location access control and monitoring systems, CCTV, if and to the extent permitted by applicable laws. In these circumstances, the data may be collected by the Company or a third party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible.
- 4.3 Where we ask you to provide personal data to us on a mandatory basis, we will inform you of this at the time of collection and in the event that particular information is required by the contract or legislation this will be confirmed. Failure to provide any mandatory information will mean that we will not be able to continue with the recruitment process with you.

5. WHAT ARE THE PURPOSES FOR WHICH DATA IS PROCESSED AND WHAT IS OUR LEGAL BASIS FOR CARRYING OUT THE PROCESSING?²

- 5.1 Your personal data are collected and processed for recruitment purposes, in accordance with applicable laws. We have set out in this Data Privacy Notice the purposes we may use your personal data for.

5.2 The legal basis on which we process your personal data

- 5.2.1 Whenever the Company processes your personal data we do so on the basis of a legal basis or justification for that processing. Processing of special categories of data is always justified on the basis of an additional lawful condition. In the majority of cases, the processing of your personal data will be justified on one of the following basis:

- 5.2.1.1 The processing is necessary for compliance with a legal obligation to which the Company is subject (e.g. checking eligibility to work within the UK) or

- 5.2.1.2 Where there is no legal obligation we will process your data where the processing is necessary for the legitimate interest of the recruitment process or

- 5.2.1.3 Where the above two grounds do not apply we may process your personal data where the processing is necessary for the legitimate interests pursued by the Company, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. The Company considers that it has a legitimate interest in processing data for the purposes set out above. This is necessary to ensure fair and effective recruitment of suitable colleagues. This is important to ensure that the Company continues to meet its business objectives and

goals both in the short and long term; maintains its reputation; and continues to attract and retain high calibre colleagues.

- 5.2.2 In exceptional circumstances where we have no legitimate interest in processing but you ask us to process data for a particular purpose we may carry out the processing on the basis of your consent. Where we rely on this we will make this clear at the time.

6. AUTOMATED DECISION MAKING AND PROFILING

- 6.1 We do not currently rely on automated decision making.

7. RETENTION OF PERSONAL DATA

- 7.1 The Company strives to ensure that personal data are kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable.
- 7.2 In regards to recruitment processes, specifically unsuccessful applicants, data is securely held for 6 months after the completion of the recruitment processes and then confidentially destroyed.

8. DISCLOSURES OF PERSONAL DATA

- 8.1 Within the Company, your personal data can be accessed by or may be disclosed internally on a need-to-know basis to:
- 8.1.1 local, regional and global People team and Recruiting Managers or other colleagues involved in the recruitment process.

9. SECURITY OF DATA

- 9.1 The Company is committed to protecting the security of the personal data you share with us through the use of robust firewalls and encryption.

10. YOUR RIGHTS AS A DATA SUBJECT

10.1 Right to access, correct and delete your personal data

- 10.1.1 The Company aims to ensure that all personal data are correct.
- 10.1.2 You have the right to request access to any of your personal data that the Company may hold, and to request correction of any inaccurate data relating to you. In addition you have the right to request the deletion of any irrelevant data we hold about you. Please contact the your local People team contact to request access.

10.2 Right to restriction of processing:

You have the right to restrict our processing of your personal data where:

- 10.2.1 you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
- 10.2.2 where the processing is unlawful but you do not want us to erase the data;
- 10.2.3 where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- 10.2.4 where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether the Company has compelling legitimate grounds to continue processing.

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Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

10.3 **Right to withdraw consent**

Where we have relied on your consent to process particular information and you have provided us with your consent to process data, you have the right to withdraw such consent at any time. You can do this by contacting your local People contact. It will only however be rarely that we rely on your consent to process personal data for recruitment purposes.

10.4 **Right to object to processing justified on legitimate interest grounds**

Where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

10.5 **Right to complain**

You also have the right to lodge a complaint with the relevant authority if you consider that the processing of your personal data infringes applicable law.

10.6 For further information regarding your rights, or to exercise any of your rights, please contact the Group Data Protection Officer.