

## Candidate Privacy Policy

### Who we are

The data controller with control of your personal information is Regents Park Securities Limited of 77 New Cavendish Street, London, W1W 6XB.

In this Policy, 'RPS', 'we', 'us', 'Company' and 'our' means Regents Park Securities Limited. This Policy is issued in accordance with the General Data Protection Regulation EU 2016/679 (GDPR).

### Introduction

Regents Park Securities Limited is committed to protecting the privacy and security of your personal information.

As a data controller, we are responsible for deciding how we hold and use personal information about you. As part of our candidate application and recruitment process RPS collects, processes and stores personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application and assessment.

This Policy sets out:

- Why we collect your personal information;
- What information is collected; and
- How it is processed within the recruitment process.

Please take the time to read and understand this Privacy Policy. For the purpose of this Policy the term "processing" will cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

### What personal information is collected about you and why?

In order to manage your application, we need to process certain personal information about you. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements.

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your CV and covering letter, including name, address, telephone number, personal email address, date and place of birth, gender, employment history, education history including qualifications and skills; and information regarding your basic salary, benefits, bonuses;
- Any information you provide to us during an interview;
- Any information from your referees;
- Assessment results, e.g. psychometric assessment results, video or telephone assessment.

During the process we may also collect some sensitive personal information about you, such as information about your health, including any medical condition, health and sickness records and information about criminal convictions and offences. We do this in order to make reasonable adjustments to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting at RPS (if successful) and to ensure that we comply with our legal obligations with regards to our recruitment process.

### How is your personal information collected?

We may collect personal information about candidates from the following sources:

- You, the candidate.
- Appropriate recruitment agencies, from which we collect the following categories of data: personal details and employment history or any other details you have provided to the recruitment agency as part of your involvement with them which they pass on to us.
- A third party checking service, from whom we collect information from a credit check, identity check and criminal record check.
- Your named referees, from whom we request and may collect the following categories of data: your previous position, dates of employment, reason for leaving, overall evaluation, strengths, relationship with colleagues/clients, technical ability, areas of improvement, attendance and time keeping and disciplinary information and re-employment information. For candidates applying for a FCA controlled function, we also collect further information as set out in the FCA Regulatory Reference Template.

### How do we use information about you?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role;
- To make reasonable adjustments in the recruitment process for disability;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our recruitment process; and
- Comply with legal or regulatory requirements.

It is in our legitimate interest to decide whether to appoint you to work for RPS since it would be beneficial to our business to appoint someone to the roles which we have advertised at any given time.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received the information you have provided to us as part of the application process, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references, carry out a criminal record check and carry out any other pre-recruitment we need to do before confirming your appointment.

**Please note, if your application is successful and you are subsequently offered and accept employment with us, the information we collect during the application and recruitment process will become part of your employment record.**

### How do we use particularly sensitive personal information?

We may use your particularly sensitive personal information for the following reasons:

- We may use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview or at any other stage in the process.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

### If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references

for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### Information about criminal convictions

We do not envisage that we will process information about criminal convictions.

### Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### Who do we share your personal information with?

We will only share your personal information with the following third parties for the purposes of processing your application:

- recruitment agencies; and
- employment screening checks.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

### How do we protect your personal information?

We have implemented appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### How long do we keep your personal information?

If we have received your information for an application, and you have been unsuccessful in your application, your information will be held for 6 months after the date your application was deemed unsuccessful. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. Once this period has elapsed, we will securely destroy your personal information in accordance with applicable laws and regulations.

### Your rights

You have a number of legal rights in relation to the personal information that we hold about you. These rights include:

- Request access to your personal information ("data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

If you wish to exercise these rights, please contact RPS in writing. Our contact details are set out at the end of this Privacy Policy. You can find out more information about your rights by contacting the Information Commissioner's Office, or by searching their website at [www.ico.org.uk](http://www.ico.org.uk).

#### How to contact us

For questions, comments and requests about our Privacy Policy or the personal information we hold about you, please contact us at the address below:

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London  
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Phone: +44 203 515 5600