

DATA PROTECTION PRIVACY NOTICE FOR CANDIDATES

SETL LIMITED

Data protection privacy notice (Candidates)

This notice explains what personal data (information) you provide by applying for a position with SETL, with the exception of the “Equality opportunity and diversity” section. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a ‘privacy notice’) and any other similar notice we may provide to you from time to time when we collect or process personal information about you. In this notice, references to ‘we’ or ‘us’ mean your employer and its group companies.

Who collects the information

By applying for a position, your information will be collected by:

- Us;
- any recruitment consultant or agency via whom you have made your application; or
- Jefferson Hunt Limited¹, who provides SETL with background screening services.

If you apply to us via a recruitment consultant or agency, then they are the ‘data controller’ and they gather and use certain information about you. This information, or part of it, may also be used by the other companies named above.

If you apply directly to us, we are the ‘data controller’ and we gather and use certain information about you. This information, or part of it, may also be used by the other companies named above.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection (Employment) Policy, available from our [Legal department](#).

About the information we collect and hold

The table set out in the Schedule summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in the Schedule with other parties, such as external contractors and our professional advisers and potential purchasers of some or all of our business or on a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices, and those of third party agencies, service providers, representatives and agents as described in the Schedule.

Information may be transferred internationally to other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our Information Security Policy. The Information Security Policy is available from our [Legal department](#).

¹Jefferson Hunt Limited, registered in England and Wales number 4126216. Registered office: 1D Danns Lane, Wateringbury, Maidstone, Kent, ME18 5LW.

How long we keep your information

We keep your information for up to one year for use in connection with future vacancies and/or further applications made by you for a position with us. Further details on this are available in our Data Retention Guidelines, available from our [Legal department](#).

Your rights to correct and access your information and to ask for it to be erased

Please contact our [Legal department](#) if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our [Legal department](#) for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our [Legal department](#) will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that our [Legal department](#) can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

The Schedule

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information in applications you make directly for positions within our organisation	From you	<p>To comply with our legal obligations;</p> <p>Legitimate interest:</p> <p>to comply with legal, regulatory and corporate governance obligations and good employment practice;</p> <p>to ensure our business policies such as those concerning recruitment and security, are adhered to.</p>	<p>To assess and process the application</p> <p>To protect and carry out our legitimate interest</p> <p>Information shared with relevant manager and HR Personnel</p>
Information in applications any recruitment consultant or agency make on your behalf for positions within our organisation	From any recruitment consultant or agency via whom you have made your application	<p>To comply with our legal obligations;</p> <p>Legitimate interest:</p> <p>to comply with legal, regulatory and corporate governance obligations and good employment practice;</p> <p>to ensure our business policies such as those concerning recruitment and security, are adhered to.</p>	<p>To assess and process the application</p> <p>Information shared with relevant manager and HR Personnel</p>
Your name and email address†	From you and any recruitment consultant or agency via whom you have made your application	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations;</p> <p>Legitimate interest:</p> <p>to comply with legal, regulatory and corporate governance obligations and good employment practice;</p> <p>to ensure our business policies, such as those concerning screening, screening and recruitment, are adhered to;</p> <p>to carry out security vetting.</p>	<p>To enter into/perform the employment contract</p> <p>To protect and carry out our legitimate interest</p> <p>Information shared with Jefferson Hunt Limited, with consultants we may engage fore background screening checks and HR Personnel</p>

Your contact details (ie address, home and mobile phone numbers) and emergency contacts (ie name, relationship and home and mobile phone numbers) †

From you and any recruitment consultant or agency via whom you have made your application

To enter into/perform the employment contract
to comply with our legal obligations;
Legitimate interest:
to comply with legal, regulatory and corporate governance obligations and good employment practice;
to ensure our business policies, such as those concerning screening, screening and recruitment, are adhered to;

To enter into/perform the employment contract
Information shared with relevant managers and HR Personnel

Your educational history and qualifications†

From you and any recruitment consultant or agency via whom you have made your application

to comply with our legal obligations;
Legitimate interest:
to comply with legal, regulatory and corporate governance obligations and good employment practice;
to ensure our business policies, such as those concerning screening, screening and recruitment, are adhered to;
for security vetting

To enter into the employment contract
Information shared with Jefferson Hunt Limited, relevant managers and HR Personnel

Your employment and working history†

From you and any recruitment consultant or agency via whom you have made your application

to comply with our legal obligations;
Legitimate interest:
to comply with legal, regulatory and corporate governance obligations and good employment practice;
to ensure our business policies, such as those concerning screening, screening and recruitment, are adhered to;
for security vetting

To enter into the employment contract
Information shared with Jefferson Hunt Limited, relevant managers and HR Personnel

Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information †

From you and, where necessary, the Home Office or OFII

To enter into/perform the employment contract

to comply with our legal obligations;

Legitimate interest:

to comply with legal, regulatory and corporate governance obligations and good employment practice;

to ensure our business policies, such as those concerning screening and recruitment, are adhered to;

for security vetting

To carry out right to work checks

Information may be shared with, for our employees in the UK, with the Home Office and, for our employees in France, with OFII

Criminal records information, including the results of Disclosure and Barring Service (DBS) checks †

From you and the DBS

To perform the employment contract

To comply with our legal obligations

For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)

To carry out statutory checks

Information shared with DBS, Jefferson Hunt Limited and other regulatory authorities as required

For further information, see * below

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked '†' above to us to enable us to verify your right to work and suitability for the position. If you do not provide this information, we may not be able to employ you.