

# Sesame Services Limited Privacy Notice for Candidates

## What is the purpose of this document?

**Sesame Services Limited** is the data controller responsible for the personal information collected and processed as part of the recruitment process. This means that we determine the purposes for which, and the manner in which, your personal information is processed.

This Recruitment Privacy Notice applies to individuals applying for employment, worker, contractor, or other engagement opportunities with us. It explains how and why we collect, use, store, and protect your personal information during the recruitment process, including any pre-employment screening and verification activities. It also sets out the categories of personal information we process, the lawful bases for processing, who we may share your information with, how long we retain it and the rights available to you under applicable data protection legislation.

We are committed to processing your personal information fairly, lawfully, and transparently, and to ensuring that it is handled in accordance with UK data protection laws and regulatory requirements.

## Data protection principles

We are committed to protecting your personal information and will process it in accordance with applicable data protection laws. This means that your personal information will be:

- Processed lawfully, fairly and transparently.
- Collected only for specified, explicit and legitimate purposes and not used in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary for the purposes for which it is processed.
- Accurate and, where necessary, kept up to date.
- Retained only for as long as necessary to fulfil the purposes for which it was collected, including to meet any legal, regulatory or reporting requirements.
- Protected through appropriate technical and organisational security measures to safeguard it against unauthorised access, loss, misuse, alteration or disclosure.
- Processed in a manner that ensures appropriate accountability and compliance with data protection obligations.

## The kind of information we may collect about you

As part of the recruitment and selection process, we collect, store, and use personal information about you to assess your suitability for employment, verify the information you provide, comply with legal and regulatory obligations, and protect our business from fraud and other unlawful activity.

The categories of personal information we may collect include:

- Personal identification and contact details, such as your name, title, address, telephone number, email address, date of birth, and right-to-work status.
- Information contained within your application, CV, covering letter, and supporting documentation, including your employment history, qualifications, professional memberships, skills, experience, achievements, and references.
- Information gathered during interviews, assessments, testing exercises, and other stages of the recruitment process.

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- Information obtained through pre-employment screening, background checks, identity and qualification verification, and references, where relevant to the role.
- Information relating to directorships, regulatory findings, sanctions screening, adverse media, financial probity checks, and other due diligence activities where required for legal, regulatory, or business purposes.
- Records of communications between you and us during the recruitment process.

### Special Category and Criminal Offence Data

In certain circumstances, we may collect and process more sensitive categories of personal information where this is necessary, proportionate, and permitted by law. This may include:

- Information relating to your health, disability status, medical conditions, or any reasonable adjustments required to enable you to participate in the recruitment process.
- Diversity and equal opportunities monitoring information, where voluntarily provided.
- Information relating to criminal convictions and offences where relevant to the role and where such checks are required or permitted by law.

We may also process information obtained through pre-employment screening and verification processes to validate information provided during your application and to help detect and prevent recruitment fraud, identity fraud, misrepresentation of qualifications or employment history, financial crime, and other unlawful activities.

Any special category or criminal offence data will be processed with appropriate safeguards and access controls and only by authorised individuals with a legitimate business need to know.

### How is your personal information collected?

We collect personal information about job applicants from a variety of sources as part of our recruitment, pre-employment screening, regulatory compliance, and fraud prevention processes. These sources include:

- **You, the applicant**, including information provided through your application form, CV, correspondence, interviews, assessments, and other interactions during the recruitment process.
- **Recruitment agencies and recruitment partners** that you have engaged with, from whom we may receive information including your name, title, contact details, date of birth, employment history, qualifications, professional experience, skills, eligibility to work, and other information relevant to your application.
- **Background screening providers**, such as Reed X Checker, from whom we may obtain information relating to identity verification, criminal convictions and offences (where applicable), directorships, regulatory findings, and adverse media searches linked to financial crime, fraud, money laundering, terrorism, or other matters relevant to the role.
- **Credit reference agencies**, such as Creditsafe, where relevant and proportionate to the position. Information obtained may include address history, insolvency records, County Court Judgments (CCJs), bankruptcy information, and other financial probity data relevant to assessing suitability for certain regulated or financially sensitive roles.
- **Government and regulatory sources**, including sanctions screening databases and publicly available government registers. These checks may identify whether an individual is subject to financial sanctions, regulatory restrictions, disqualifications, or other measures relevant to legal, regulatory, and financial crime compliance obligations.

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- **The Disclosure and Barring Service (DBS)**, where criminal record checks are required or permitted by law for the role concerned.
- **Referees nominated by you**, from whom we may obtain information relating to your employment history, dates of employment, job title, performance, conduct, attendance, disciplinary record, reason for leaving, and suitability for the position.
- **Publicly available sources**, including professional networking sites and professional registers, where relevant to verify information provided during the recruitment process, assess qualifications and professional memberships, and help identify potential instances of misrepresentation, fraudulent applications, or other integrity concerns.

The information obtained from these sources helps us assess your suitability for employment, verify the accuracy of information provided, meet our legal and regulatory obligations, protect our business and customers, and detect and prevent recruitment fraud, identity fraud, financial crime, and other unlawful activity.

### How we will use information about you

We will use the personal information you provide during the recruitment process to:

- Assess your skills, qualifications, experience, and suitability for the role.
- Manage and communicate with you throughout the recruitment process.
- Verify the information provided in your application.
- Conduct pre-employment screening, background checks, and reference checks where relevant to the role.
- Maintain records relating to our recruitment activities.
- Meet our legal, regulatory, and governance obligations.
- Protect our business from fraud and other risks.

We process your personal information because it is necessary to take steps at your request before entering into an employment contract and because we have a legitimate interest in identifying and selecting suitable candidates for our vacancies.

We will review the information provided in your application to determine whether you meet the requirements of the role. Where appropriate, we may invite you to participate in interviews, assessments, or other selection activities. Information obtained during these stages will be used to evaluate your suitability and inform recruitment decisions.

If you are selected for appointment, we may carry out pre-employment checks where these are relevant and proportionate to the role. These may include verification of your identity, right to work in the UK, employment history, professional qualifications, references, and any other checks required by law, regulation, or our internal policies. For certain regulated or senior positions, additional screening may be required, such as criminal records checks, financial soundness checks, sanctions screening, directorship checks, or adverse media searches.

### Situations in which we will use your personal information

We process your personal information throughout the recruitment process to assess your suitability for employment, manage your application, comply with legal and regulatory obligations, and, where applicable, prepare for your employment with us.

We will only process your personal information where we have a valid lawful basis for doing so. These lawful bases include:

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- **Contract:** Processing necessary to take steps at your request before entering into an employment contract.
- **Legal Obligation:** Processing necessary to comply with our legal or regulatory responsibilities.
- **Legitimate Interests:** Processing necessary for our legitimate business interests, provided these do not override your rights and freedoms.

| Purpose of Processing                                                                                        | Lawful Basis                           | Typical Recipients                                                               |
|--------------------------------------------------------------------------------------------------------------|----------------------------------------|----------------------------------------------------------------------------------|
| Reviewing and assessing your application, including shortlisting and interview decisions                     | Contract, Legitimate Interests         | Hiring Managers, HR, Recruitment Partners                                        |
| Communicating with you throughout the recruitment process                                                    | Contract                               | Hiring Managers, HR                                                              |
| Verifying qualifications, employment history, references and suitability for the role                        | Legal Obligation, Legitimate Interests | Previous Employers, Referees, Screening Providers, HR                            |
| Confirming your right to work in the UK                                                                      | Legal Obligation                       | HR, Government Authorities, Immigration Advisers (where applicable)              |
| Conducting pre-employment screening, background checks and regulatory references where required for the role | Legal Obligation, Legitimate Interests | Screening Providers, Regulatory Bodies, Referees                                 |
| Making decisions regarding an offer of employment and preparing employment documentation                     | Contract                               | HR, Hiring Managers                                                              |
| Providing reasonable adjustments during the recruitment process                                              | Legal Obligation                       | HR, Occupational Health Providers (where applicable)                             |
| Complying with legal, regulatory and governance requirements                                                 | Legal Obligation                       | Regulators, Government Bodies, Legal Advisers, Law Enforcement Agencies          |
| Preventing fraud, protecting our business and maintaining security                                           | Legal Obligation, Legitimate Interests | Fraud Prevention Teams, Security Providers, Regulators, Law Enforcement Agencies |
| Monitoring equality, diversity and inclusion within our recruitment processes                                | Legal Obligation, Legitimate Interests | HR, Management, Regulators (where required)                                      |
| Defending or responding to legal claims, complaints or disputes arising from the recruitment process         | Legal Obligation, Legitimate Interests | Legal Advisers, Insurers, Regulators, Courts and Tribunals                       |

### Special Category Data

Where necessary and permitted by law, we may process special category personal data, such as information relating to health, disability, diversity monitoring, or criminal records checks (where relevant to the role). Such information will only be processed where we have an additional lawful condition for doing so under applicable data protection legislation.

### Lawful Basis

In some circumstances, more than one lawful basis may apply to the same processing activity. For example, we may process your information both to take steps towards entering into an employment contract and to comply with our legal obligations. We will always ensure that any processing of your personal information is lawful, fair and transparent.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### If you fail to provide personal information

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If you do not provide information that is required for us to assess your suitability for the role, such as evidence of qualifications, employment history, or other relevant documentation, we may be unable to progress your application.

In certain circumstances, the recruitment process may involve obtaining references, conducting background checks, or carrying out other pre-employment screening activities that are relevant and proportionate to the role. Where this information is required and you are unable or unwilling to provide the necessary details, we may not be able to continue considering your application.

### **How we use particularly sensitive personal information**

As part of the recruitment process, we may collect and process certain categories of sensitive personal information where it is necessary, appropriate, and permitted by law. This may include special category data, such as information relating to your health or disability status, as well as criminal offence data where relevant to the role.

We may use information about your health or disability status to assess whether reasonable adjustments are required during the recruitment process and, where applicable, to support equal opportunities monitoring and compliance with our legal obligations under employment and equality legislation.

Where criminal record checks are undertaken, we may use information relating to criminal convictions and offences to assess your suitability for a particular role, taking into account the nature of the position, regulatory requirements, and any risks that may be relevant to the business. Any such assessment will be carried out on a fair, proportionate, and case-by-case basis.

We recognise the sensitive nature of this information and have implemented appropriate safeguards to protect it. Access is restricted to those individuals who have a legitimate business need to know, and all information is processed in accordance with strict confidentiality requirements. We maintain appropriate technical and organisational security measures, data retention controls, and policies governing the handling of special category and criminal offence data to ensure compliance with applicable data protection, employment, and equality legislation.

We will only collect and process special category or criminal offence data where there is a lawful basis for doing so and where the processing is necessary for carrying out our rights and obligations in connection with employment, social security, social protection, regulatory requirements, or the establishment, exercise, or defence of legal claims.

### **Information about criminal convictions**

As part of our recruitment process, we may collect information relating to criminal convictions and offences where this is relevant and proportionate to the role for which you are being considered. Such checks will normally only be undertaken once a conditional offer of employment has been made and will be subject to any other pre-employment requirements, such as satisfactory references and right-to-work checks.

For certain senior or regulated positions, including Director roles, we may be required or entitled to obtain a Standard Disclosure and Barring Service (DBS) check where the role is eligible under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. This enables us to assess an individual's suitability for positions involving significant responsibility, governance, or regulatory oversight.

For other roles within Sesame Bankhall Group, we may request a Basic DBS check where appropriate and proportionate, particularly where the role involves access to confidential information, customer data, financial information, or positions of trust. Any criminal record information disclosed will be considered on a case-by-case basis, taking into account the nature of the role, the relevance of the conviction, and the circumstances involved. A criminal conviction will not automatically prevent an individual from obtaining employment with us.

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We process criminal offence data only where permitted by law and have implemented appropriate policies, procedures, and safeguards to ensure that such information is handled fairly, securely, and in accordance with employment and data protection legislation. Criminal records information will be accessed only by those who need to know it for recruitment purposes and will be retained only for as long as necessary in accordance with our retention policies and legal obligations.

### Automated decision-making

Any decision that could significantly affect you will involve meaningful human review and will not be made solely by automated systems.

### Data sharing

#### Why might you share my personal information with third parties?

We will only share your personal information with third parties where necessary to support the recruitment process, including the administration of psychometric testing and other candidate assessments.

All third-party service providers acting on our behalf are required to implement appropriate technical and organisational measures to safeguard your personal information and to process it in accordance with applicable data protection laws and our instructions. We do not permit third parties to use your personal information for their own purposes and only authorise them to process it for specified recruitment-related activities and in line with our contractual requirements.

### Data security

We take the security of your personal information seriously and have implemented appropriate technical and organisational measures to protect it against accidental loss, unauthorised access, use, disclosure, alteration, or destruction.

Access to personal information is restricted to employees, agents, contractors, and other third parties who have a legitimate business need to know. Such individuals are authorised to process personal information only in accordance with our instructions and are subject to strict confidentiality obligations.

We also maintain documented procedures for identifying, investigating, and responding to actual or suspected personal data breaches. Where required by law, we will notify affected individuals and the appropriate regulatory authority of a personal data breach within the applicable timescales.

### Data retention

#### How long will you use my information for?

We will retain your personal information for **six months** following the conclusion of the recruitment process and the communication of our decision regarding your application. We retain this information to maintain an accurate record of the recruitment process, to respond to any queries or challenges relating to our decision, and to demonstrate that the recruitment process was conducted fairly, consistently, and in accordance with applicable employment and equality legislation.

At the end of the retention period, your personal information will be securely deleted or destroyed in accordance with our retention policies and applicable legal and regulatory requirements.

If we would like to retain your details for consideration for future employment opportunities, we will contact you separately to seek your consent. Where consent is provided, we will retain your personal information for a specified period and explain how it will be used, as well as your right to withdraw your consent at any time.

## Rights of access, correction, erasure, and restriction

### Your rights in relation to your personal information

Under data protection law, you have a number of rights regarding your personal information. Subject to certain conditions and exemptions, you have the right to:

- **Request access** to the personal information we hold about you (commonly known as a Subject Access Request). This enables you to receive a copy of your personal information and understand how and why we process it.
- **Request correction** of any incomplete or inaccurate personal information that we hold about you.
- **Request erasure** of your personal information where there is no lawful reason for us to continue processing it. In certain circumstances, you may also request deletion where you have successfully objected to processing.
- **Object to the processing** of your personal information where we are relying on a legitimate interest as the lawful basis for processing and you believe your particular circumstances warrant an objection. You also have the right to object to processing for direct marketing purposes at any time.
- **Request restriction of processing** of your personal information in certain circumstances, for example while the accuracy of the information is being verified or where you have objected to its processing.
- **Request the transfer** of your personal information to you or to another organisation, where this right applies.
- **Lodge a complaint** regarding the handling of your personal information. In accordance with the requirements of the Data (Use and Access) Act, we maintain a formal complaints process, including an escalation procedure, to ensure concerns are investigated and addressed appropriately.

If you wish to exercise any of these rights, including making a complaint, requesting access to your data, seeking correction or erasure, objecting to processing, or requesting the transfer of your personal information, please contact the Data Protection Officer, preferably in writing.

We will consider all requests and complaints in accordance with applicable data protection legislation. Please note that there may be circumstances where we are unable to fulfil a request, including where an exemption applies under data protection law, such as information relating to confidential references or other legally protected information. Where this is the case, we will explain the reasons for our decision where we are legally permitted to do so.

## Data protection officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Sesame Bankhall Group DPO.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

We appreciate the opportunity to resolve any queries or complaints directly before you approach the Information Commissioner's Office (ICO). In line with the requirements of the Data (Use and Access) Act, we have implemented a formal complaint handling process with a tiered escalation procedure to ensure all concerns are reviewed, managed, and resolved fairly and effectively.

## Changes to this Privacy Notice

We may update this Candidate Privacy Notice from time to time to reflect changes in applicable laws and regulations, including requirements issued by the Financial Conduct Authority (FCA), changes to our recruitment processes, or changes in how we process personal data.

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Where we make material changes to this Privacy Notice, we will take appropriate steps to inform candidates, for example by publishing the updated notice on our careers website or providing a revised copy during the recruitment process. The date of the latest update will be shown at the beginning or end of this notice.

We encourage candidates to review this Privacy Notice periodically to remain informed about how we collect, use, share and protect personal data during the recruitment process.

**Last updated: September 2026**