

## Sesame Services Limited Privacy Notice for Candidates

### What is the purpose of this document?

The Company (Sesame Services Limited) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment process, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (GDPR).

### 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.
- Kept securely.

### The kind of information we hold about you

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 may have provided to us in your CV and any covering letter, this may include; name, title, address, telephone number, personal email address, date of birth, gender, employment history, skills, qualifications and personal interests.
- Any information you provide to us during an interview or assessments.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

### How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment partners that you have entered into a relationship with, from which we collect the following categories of data: name, title, address, telephone number, personal email address, date of birth, gender, employment history, skills, qualifications and personal interests.
- Reed X Checker - background check provider, from which we collect the following categories of data: Criminal convictions, current and past directorships held and details of any adverse media linked to crime or terrorism.
- Credit safe - credit reference agency, from which we collect the following categories of data: Address history, credit score, insolvency and CCJ information.
- Gov.co.uk – sanctions check, from which we collect the following categories of data: persons subject to financial sanctions imposed by the UK, including name, D.O.B, passport details, NI Number and address.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we collect the following categories of data: employment dates, job title, absence record, reason for leaving, information in relation to your performance, time keeping and disciplinary record.

### How we will use information about you

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

- Assess your skills, qualifications, and suitability for the role.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Carry out background and reference checks, where applicable.

It is in our legitimate interests to decide whether to appoint you to the role being recruited for since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract of employment with you.

We will process the information provided as part of the recruitment process to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. 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 and carry out a number of checks including criminal record, credit and sanctions check. For a number of regulatory roles we will also carry out an adverse media and Directorship check before confirming your appointment.

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

We need all the categories of information in the list above primarily to allow us to perform our contract with you (“**Contract**”) and to enable us to comply with legal obligations (“**Legal**”). In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties (“**Legitimate interests**”), provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

Reason for processing	Lawful basis for processing	Recipients
Making a decision about your recruitment or appointment and on-boarding	Contract and legitimate interests	External Recruitment Partner Management and HR
Determining the terms on which you work for us	Contract	Management and HR
Employment vetting – checking that you are legally entitled to work in the UK and suitability to role, regulatory references if required	Legal and legitimate interests	Management and HR Third party company who perform employee checks Government agencies Immigration specialists Companies that we have requested reference from
Assessing qualifications for a particular job or task, including decisions about promotions	Contract and Legitimate interests	Management and HR
Managing our relationship and making decisions about your engagement	Contract, Legal and Legitimate interests	Management and HR
Education, training and development requirements	Contract and Legitimate interests	Third party training and system providers, Management & HR
Dealing with legal disputes involving you including accidents at work	Contract and Legal	Regulatory authorities, public authorities, enforcement bodies, legal advisers, law enforcement and other third parties

Ascertaining your fitness and requirements for work	Contract and Legal	Management and HR, Third party medical practitioners, Management and HR
Complying with health and safety, legal and regulatory obligations	Legal	Regulatory authorities, public authorities, enforcement bodies, legal advisers, law enforcement and other third parties
To prevent fraud	Legal	Financial Crime Team, Regulatory authorities, public authorities, enforcement bodies, legal advisers, law enforcement and other third parties
To conduct data analytics studies to review and better understand employee trends and patterns	Legitimate interests	Management and HR
Equal opportunities monitoring and dealing with our regulators and quality assurance	Legal and Legitimate interests	Management and HR
Management and administration of our offices	Legitimate Interests	Management, Facilities and third party security companies.

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**

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.

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

We will use your particularly sensitive personal information in the following ways:

- We will 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.
- We will use information about your criminal conviction(s) to consider whether a role at Sesame Bankhall Group would be suitable, for instance if there is a risk to the business posed by a conviction that relates to fraud or money laundering.

### **Information about criminal convictions**

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a standard criminal record check for a Director and entitled to carry out a basic criminal record check for all other roles within Sesame Bankhall Group, in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- The role of Director is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023), so is eligible for a standard check from the Disclosure and Barring Service.
- The remaining roles within Sesame Bankhall Group requires a high degree of trust and integrity since it involves dealing with customer data and so we would like to ask you to seek a basic disclosure of your criminal records history.

We have in place appropriate policies and safeguards, which we are required by law to maintain when processing such data.

### **Automated decision-making**

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

### **Data sharing**

Why might you share my personal information with third parties?

We will only share your personal information with third parties for the purposes of any further psychometric testing and assessments. All our third-party service providers and other entities in the group 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 data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Data security**

We have put in place 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, agents, 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.

### **Data retention**

How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to role. 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. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

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

#### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "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.
- 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 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.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer, preferably in writing.

### **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 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.

