Applicant Privacy Notice

This privacy notice explains what data is collected about you, and why, as an applicant for employment with XPS Group (XPS). If you are successful and we offer you a position with XPS, we will provide you with a comprehensive privacy notice at point of offer.

Who is the data controller?

A data controller is the person or organisation who determines what data to collect from you and how to use that data. A data controller is legally responsible for your data.

The data controller is your proposed employer, as set out in the advert for employment, being:

XPS Pensions Consulting Limited, XPS Pensions Limited, XPS Administration Limited, XPS Investment Limited or XPS Pensions (RL) Limited or Penfida Ltd.

The contact address is:

Phoenix House, 1 Station Hill, Reading, RG1 1NB.

When we refer to 'we' and 'us' in this notice, we mean your prospective employer.

What is the law?

The UK General Data Protection Regulation (GDPR) is the governing legislation for collecting and processing personal data.

As part of any recruitment process, we collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information do we collect?

We collect a range of information about you. This includes:

> your name, address and contact details, including email address and telephone number.

> details of your qualifications, skills, experience, and employment history.

> information about your current level of remuneration, including benefit entitlements.

> whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process.

> information about your entitlement to work in the UK.

> information about your religious beliefs (for Northern Ireland recruitment only);and

> equal opportunities and diversity monitoring information including information about your ethnic origin, gender, sexual orientation.

We may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

We may also collect personal data about you from third parties, such as online recruitment sites, references supplied by former employers, credit check providers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in recruitment systems and on other IT systems (including email).

Why do we process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend legal claims.

We may process special categories of data, such as information about ethnic origin, gender, sexual orientation or religion or belief, to monitor recruitment statistics and for the purposes of equal opportunities and diversity monitoring. Data that we use for these purposes is anonymised or is collected with the express consent of applicants, which can be withdrawn at any time. Applicants are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out our obligations and exercise specific rights in relation to employment. Where the information relates to the use of assistance or emotional support animals, we will rely on the applicant's explicit consent.

For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to your data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy, IT staff and internal and external auditors, if access to the data is necessary for the performance of their role.

We will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers, with your consent, to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

We may also be legally required to provide your information to law enforcement agencies and regulators who have legal rights of access to your information.

We will not transfer your data outside the UK or European Economic Area.

How do we protect data?

We take the security of your data seriously and have formal, documented Information Security and Data Protection policies that set out the security measures currently implemented and maintained. These core policies are supported by additional policies covering:

> Data retention

> Physical security

> Data sharing and third-party requests (including DWP, Police etc)

> Acceptable usage (e.g. email, internet facilities, telephone)

These policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, under a duty of confidentiality and an obligation to implement appropriate technical and organisational measures to ensure the security of data.

How long do we keep data for?

If your application for employment is unsuccessful, we will hold your data on file for twelve months after the end of the relevant recruitment process for consideration for future employment opportunities.

At the end of that period or if you request that we do so, your data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

What are your rights?

Data Protection Laws provide you with a number of rights, some of which do not apply to the data we process as a Data Controller. You may have the right to:

> be informed about the collection and use of your personal data; this will be done via the provision of privacy information (a privacy policy or notice).

> request copies of the personal data we hold about you and we will provide that within one calendar month. If you wish to do so you should contact us at recruitment@xpsgroup.com.

> correct any information that is incorrect, inaccurate, or incomplete.

> have your personal data erased

> restrict what we do with your information until we correct it or if you believe we are using your data unlawfully.

> move data from one provider of services to another

> object to automated decisions and profiling. We do not undertake any profiling activity. We do undertake some automated decision activity in relation to our use of an applicant tracking system for our Graduate/Internship recruitment. This system automatically sifts candidates out of the process if they do not meet pre-determined qualification criteria).

> object to the processing of your data in certain circumstances, including a right to object to our processing if our basis of processing is "legitimate interest" and you have grounds to object based on your particular situation, and an absolute right to object to the use of your data for direct marketing purposes.

> withdraw your consent to us processing your health information (which will only be the case if you have sent us that information). Any processing we undertake shall remain lawful until such time as you withdraw your consent.

The above rights are always subject to a right for us to keep your data so as to be able to defend any future legal claims.

If you would like to exercise any of these rights, please contact recruitment@xpsgroup.com.

How to complain

If you believe that we have not complied with your data protection rights, or your data has been mishandled you can complain to us or the Information Commission. You can contact us at recruitment@xpsgroup.com.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Where can you get an up-to-date copy of this notice?

We will ensure that a copy of all of our privacy notices is regularly updated and provided on our website.