

# **Recruitment Policy Notice**

As part of any recruitment process, Responsible Life Ltd. ("we" or "our") collects and processes 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?

- Responsible Life Ltd. Collects 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 the organisation needs to make reasonable adjustments during the recruitment process; and Information about your entitlement to work in the UK

Responsible Life Ltd. 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 in the form of notes from interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employer. 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 applicant record, in HR management systems and on other IT systems (including email).

### Why does Responsible Life Ltd. process personal data?

We need to process data 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 its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts.

Responsible Life Ltd. has 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 against legal claims.

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.

If your application is unsuccessful, Responsible Life Ltd. may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose, and you are free to withdraw your consent at any time.

#### Who has access to 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 and managers in the business area with a vacancy.

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 to obtain references for you, employment background check providers to obtain necessary background checks, HMRC for payroll purposes and out external HR services provider.

## How does Responsible Life Ltd. protect data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### For how long does Responsible Life Ltd. keep data?

If your application for employment is unsuccessful, we will hold your data on file for 1 year after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for consideration for future employment opportunities unless you advise us differently. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

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

# **Your rights**

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purpose of processing; and
- Object to the processing of your data where Responsible Life Ltd. is relying on its legitimate interests as the legal ground for processing

If you would like to exercise any of these rights, please contact our Compliance Team at ComplianceTeam@responsible.co.uk.

If you are concerned about the way in which we collect or use your personal data, you can raise your concern with the Information Commissions Office (ICO) on 0303 123 1113. For further details you may visit the ICO website www. ico.org.uk

### What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Responsible Life Ltd. 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.

Responsible Life Limited is authorised and regulated by the Financial Conduct Authority and is listed on the Financial Services Register (<a href="https://register.fca.org.uk/">https://register.fca.org.uk/</a>) under reference 610205. Head Office: Responsible Life, Mills Bakery, Royal William Yard, Plymouth, PL1 3GE, UK. Registered in England & Wales. Company number 7162252.