

The Fidelis Partnership Recruitment Privacy Notice

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Contents

1	Introduction	3
2	Definitions	3
3	How we process your personal data	3
3.1	Where do we get your Personal Data from?	3
3.2	What Personal Data about you will we process?.....	4
3.3	What purposes will we process your Personal Data and what is our legal basis for this?...	4
3.4	How long will we keep your Personal Data?	5
4	Sharing and transfer of your Personal Data.....	5
5	Your rights in relation to your Personal Data	5
6	Complaints	6

1 Introduction

The purpose of this recruitment privacy notice (the "**Privacy Notice**") is to provide you with information about how Fidelis Marketing Limited ("**Fidelis**", "**we**" or "**us**") collects, uses and stores your personal data. If we process any information that identifies you, either alone or alongside other information we hold, this is your **Personal Data**. We are required to comply with applicable laws around the processing and protection of your Personal Data, including the EU General Data Protection Regulation as it forms part of retained EU law in the UK (the **UK GDPR**). Under these laws, we need to give you the information set out in this Privacy Notice so that you know how your data is processed.

Where your Personal Data is processed in the context of your application, Fidelis will be the **controller** of that data. This means that we are responsible for determining how and why your Personal Data is processed. We will remain the controller of your Personal Data if your application is successful, and we will provide you with a further privacy notice if this is the case.

We will inform you of any changes to this notice by email. If after reading this Privacy Notice you have any questions, wish to file a complaint, or need to communicate with us about our processing of your Personal Data, you can contact us at dataprotection@fidelispartnership.com.

2 Definitions

2.1. In this Privacy Notice, the below terms have the following meanings:

" **Data Protection Laws**" means any applicable laws, regulations, rules or orders around the processing and protection of personal data that are applicable to Fidelis, including (i) the EU General Data Protection Regulation 2016/679 (the "EU GDPR"); (ii) the EU GDPR as it forms part of retained EU law in the United Kingdom (the "UK GDPR"); and (iii) the UK Data Protection Act 2018;

"**Employees**" means the employees, directors, temporary employees and interns of Fidelis. Fidelis may from time to time appoint **non-executive directors** of the business, and the term "**Employees**" in this notice will apply to these non-executive directors unless this notice states otherwise;

"**Personal Data**" means any information relating to an identified or identifiable natural person; and

"**Special Category Data**" means any information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data where processed for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

3 How we process your personal data

3.1 Where do we get your Personal Data from?

We collect personal information about prospective employees **through our application and recruitment process**, either directly from you, from an employment agency or from our background check provider.

We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies (such as for screening purposes). We may collect information about you that is publicly accessible, for example through LinkedIn or information which is available at Companies House.

As part of our screening process, the background check agency that we partner with uses an artificial intelligence (“AI”) tool to screen your personal information as part of the social media check. All information which is flagged by the background check agency is then reviewed by a member of our HR team to verify its accuracy.

If we receive your application through a recruitment agent, they may send an anonymised CV or they may send us your name and information contained in your CV. All the information you provide during the recruitment process will only be used for progressing your application, or to fulfil legal or regulatory requirements where necessary.

3.2 What Personal Data about you will we process?

We may collect, store, and use any of the following categories of personal information about you:

- 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;
- your desired salary and benefits;
- information of your entitlement to work in the UK;
- evidence of your entitlement to work in the UK (contractors only);
- and
- details of any disability for which the organisation needs to make reasonable adjustments.

3.3 What purposes will we process your Personal Data and what is our legal basis for this?

We will process your personal data to allow us to pursue our **legitimate interests** in reviewing and progressing your application. This includes making a decision about your recruitment or appointment, determining the terms on which you will work for us, assessing your qualifications for a particular role and equal opportunities monitoring. We may also process your personal data where necessary for us to comply with a legal obligation under UK law.

"Special Category Data" means any information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data where processed for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. We will only process your Special Category Data where one of the limited conditions set out in applicable data protection law permitting this applies. In particular:

- we may use information about your physical and mental health, or disability status, to ensure your health and safety in the application process and provide appropriate adjustments; and

- we may also use information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

If you do not provide the Personal Data that we request, we may be unable in some circumstances to provide you with certain services as your employer and we will tell you about the implications of that decision.

3.4 How long will we keep your Personal Data?

If your application is unsuccessful, we will hold your Personal Data for six months after the end of the relevant recruitment process. If your application is successful, your personal data will be subject to the retention periods set out in the relevant employee privacy notice.

If in the future we intend to process your Personal Data for a purpose other than that which it was originally collected, we will provide you with information about that purpose and any other relevant information.

4 Sharing and transfer of your Personal Data

Your information may be shared internally within Fidelis for the purposes of our recruitment process. This includes interviewers involved in the recruitment process and managers in the relevant business area.

In certain circumstances, we may need to share your personal information with third parties, where required by law or where we have a legitimate interest in doing so. This includes:

your previous employer and any university and other further education establishments you may have attended, in order to verify the information which you have provided to us about your work history, education and qualifications;

- providers of DBS and credit reference checks; and
- regulatory bodies or law enforcement agencies, where we receive a request that we are legally required to comply with.

For the above purposes, we may transfer your personal data outside the UK. Where your personal data is transferred outside the UK to a jurisdiction that is not considered to offer an "adequate" level of personal data protection by the UK authorities, we take steps to secure your personal data in accordance with applicable Data Protection Laws. You may request a copy of the specific safeguards we use to protect your personal data.

5 Your rights in relation to your Personal Data

You have a number of rights with regard to your Personal Data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

You have the right to lodge a complaint with the data protection regulator in your jurisdiction if you believe that we have not complied with the requirements of applicable data protection laws in relation to your Personal Data. In the UK, the regulator is the Information Commissioner's Office (ICO).

6 Complaints

If you have any concerns or complaint around how The Fidelis Partnership are dealing with your personal data, or any request for information or complaint, you have the right to lodge a complaint with the supervisory authority in the European Economic Area (a list of the relevant data protection authorities can be found online [here](#)) or the Information Commissioner's Office (the "ICO") in the UK.

UK Complaints

If you have applied for a role at The Fidelis Partnership and you have any concerns around how The Fidelis Partnership are dealing or have dealt with your personal data, or any request for information or complaint, you can raise a complaint with us using our internal complaints handling process.

How to raise a complaint with us

You may submit a data protection complaint to us using any of the following methods:

- **By email:** dataprotection@fidelispartnership.com (please mark your email "Data Protection Complaints – Confidential")
- **By post:** Data Protection, Fidelis Marketing Limited, 22 Bishopsgate, Level 42, London, EC2N 4BQ (please mark your envelope "Data Protection Complaint – Confidential")
- **Online:** by completing our [Data Protection Complaints Form](#)

When submitting your complaint, please provide as much detail as possible, including the nature of your concern, relevant dates, and any supporting information. If you are submitting a complaint on behalf of another individual, we will require evidence of that person's authority or consent before processing the complaint. If you require this information in an alternative format or need assistance in submitting a complaint, please contact us and we would be happy to help.

What happens next

We will acknowledge your complaint within 30 days.

We aim to investigate and respond to your complaint as soon as possible. Where necessary, we may request additional information or contact relevant third parties as part of our investigation. Please note, complex complaints may take up to three months to investigate.

Escalation to a supervisory authority

If you are unhappy with how we have handled your complaint, you have the right to escalate it to the ICO.

You may submit your data protection complaint to the ICO using any of the following methods:

- **By post:** The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- **By email:** casework@ico.org.uk.
- **Online:** [Make a complaint about how an organisation has used your personal information | ICO](#)

If you need assistance in making a complaint, please call the helpline on 0303 123 1113.

Complaints outside of the UK

If your complaint relates to how Pine Walk Europe Limited is dealing with your personal data, you should write to The Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland. They may be reached online here: <https://forms.dataprotection.ie/contact>

If you wish to lodge a complaint with a different supervisory authority in the European Economic Area a list of the relevant data protection authorities can be found online [here](#).

If your complaint relates to Fidelis Opco Limited, please refer your complaint to the [ADGM Office of Data Protection](#).

Should your complaint relate to TFP Bermuda Limited, you should write to The Office of the Privacy Commissioner Bermuda, Maxwell Roberts Building, 4th Floor, 1 Church Street, Hamilton, HM11, Bermuda.

We would be grateful for the opportunity to respond to your complaint first.