

Applicant Privacy Notice

Introduction:

Data protection legislation (which includes the General Data Protection Regulation or GDPR) places obligations on us, Moneybarn Limited, in relation to the way that we handle your personal information. We must process your information fairly and lawfully. This also means you are entitled to know how we intend to use your information. All our employees are responsible for ensuring personal data is kept confidential. We provide training to all our colleagues to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

The identity of the controller and their contact details

This privacy statement explains how Moneybarn Limited, part of Provident Financial Management Services Limited, the operator of the website www.Moneybarn.com, uses your personal information submitted during the recruitment process and provides information about your rights in relation to your personal information. Moneybarn Limited is the controller of your information. This privacy statement applies to your use of the recruitment services on the site. Moneybarn Limited may update this privacy statement and so you should check it from time to time and always before you submit an application to us to make sure that you are happy with any changes that may have been made. Our aim is to be as clear and open as possible about what information we collect from you, what we do with your personal data, how we use it and your rights as the data subject. If you apply for a position using our careers page, we will use the information you provide (including personal data) for the recruitment purposes outlined in this privacy statement.

The identity of the Data Protection Officer

Moneybarn has a Data Protection Officer to ensure that your personal data is being treated fairly and lawfully and protected at all times. If you need to contact the Data Protection Officer, please email dpo@moneybarn.com or write to the Data Protection Officer, Moneybarn, Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ.

Categories of personal data processed

You can look through our careers page without giving us any personal data. You are under no statutory or contractual obligation to provide data to Moneybarn Limited 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.

If you decide to apply for a role via the Careers page, we will need to collect and process your personal data, including:

- 1. Name, address and postcode without this we would not be able to identify you as an applicant or know where to send recruitment information to. We also need this in order to process the necessary pre-employment checks.
- 2. Email address We may contact you via email regarding your application or to advise you of similar alternative vacancies if you have consented to us doing so. We may also contact you by email if you have only partially submitted your CV in application.
- 3. Contact telephone numbers if there are any problems with your application or we need to clarify anything with you, we need to be able to contact you quickly.
- 4. Your application this is required so that we may assess you. We will collect and process data



about your skills (including education, professional qualifications and training) and employment history. You should only provide the information requested in the job advert.

- 5. Disability data any personal data you provide about your health is sensitive personal data. By providing this information, you agree to allow us to use it for the purposes of making any reasonable adjustments during the recruitment process and for monitoring purposes.
- 6. Credit reference checks with a licensed credit reference agency we are required by law to employ 'fit and proper persons'. Your credit file provides us with the information to assist us in assessing your fitness to work for an authorised consumer credit business.
- 7. Criminal records checks For some roles we are legally obliged to seek information about previous criminal convictions and offences or carry out criminal records checks. If this is necessary, we will make you aware of this as early in the recruitment process as possible. These do not normally take place until after you have accepted a conditional job offer.
- 8. Other personal data specified during the application process that is relevant to recruitment.

If your application is successful and we make a conditional job offer to you we will also require details of your referees, your National Insurance number and any other proof of your right to work in the UK/ROI, for example visa or working permits, bank details, date of birth, next of kin and driving licence (if applicable).

Why we process your data

As a business we use the data we obtain from you and the information we collect about you (from your CV application, through interviews or other forms of assessment) to perform a number of activities. Under data protection law we are only allowed to use your personal information where we have a legal basis to do so. We set out below an explanation of the legal basis that we rely on to allow us to use your information.

As mentioned above, Moneybarn Limited is part of Provident Financial Management Services Limited, which consists of a wider Group of companies. In most cases any data we and the other companies obtain are shared amongst each other to ensure that we are managing your relationship with us in the most informed way e.g. if you apply for a vacancy in another part of the group.

Processing your data as a Legitimate Interest

The Provident Group companies as outlined above may process and sometimes share your information amongst each other for administrative activities where we have a legitimate business need. Some examples are;

- 1. To maintain internal record keeping.
- 2. To provide general aggregate information (which does not identify individuals) and statistics to help Provident develop its websites and services.

Moneybarn Limited 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 Moneybarn to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Moneybarn Limited may also need to process data from job applicants to respond to and defend against legal claims.



Keeping your information accurate

It is your responsibility to ensure that all of the personal data you provide is true and is not misleading, deceptive or inaccurate in any way. If you believe any of the personal data Moneybarn Limited holds about you is incorrect, please inform the Talent Acquisition Team at Careers@moneybarn.com. If at any time after the submission of your application, you become unavailable to work, or if you simply change your mind, please email the Talent Acquisition Team at Careers@moneybarn.com to withdraw your application.

How we use Fraud prevention agencies (UK only)

We will undertake this processing under a legitimate business interest. Fraud prevention databases have been established for the purpose of allowing employers to share data on their employment fraud cases.

Should our investigations identify fraud or the commission of any other criminal offence by you [on your part] when applying for, or during the course of your employment with us, we will record the details of this on the relevant fraud prevention databases. This information may be accessed from the UK and other countries and used by law enforcement agencies and by us and other organisations to prevent fraud.

Please contact us at dpo@moneybarn.com if you want to receive details of the relevant fraud prevention databases through which we share information.

Processing your data for legal reasons

Moneybarn Limited needs to process data to ensure that it is complying with its legal obligations. For example, to check that a successful applicant has the right to work in the UK/ROI before employment starts or to carry out its obligations and exercise specific rights in relation to employment such as processing information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability.

We will treat your information as private and confidential but may share it with other companies within the group and disclose it outside the Group if we are legally obliged to do so. Examples of this are:

- 1. Passing information to HMRC/the revenue or other similar government authorities.
- 2. Required by the Police and other law enforcement agencies to investigate or prevent crime.
- 3. Required by the authorities when we report on any suspicious activity.
- 4. To carry out equal opportunities monitoring (see below).

Equality Monitoring

We are required by law to make basic documentation checks on every candidate. Please note that you will be asked to provide documentation of your eligibility to work in the UK if you are invited to attend the next stage of the recruitment process with us. Other personal data (including special categories of personal data), for example, relating to your gender, race or ethnic origin, religion or belief, age bracket, details of any disability and sexual orientation is requested for the purpose of monitoring the effectiveness of our Equal Opportunities policy.



Processing your data for contractual reasons

There are a number of activities that we will perform to use your data to administer your employment application with us in line with any contractual or pre-contractual requirements. Some examples of the contractual processing we undertake are;

- 1. To approach your nominated referees for the purposes of obtaining references.
- 2. To consider you for the position for which you have applied, and subsequent suitable vacancies (where you provide your consent to this).
- 3. Make up part of your personnel records if your application is successful (but only to the extent that such information is relevant to your on-going employment).

Processing your data with your consent

There will be circumstances where we will only process your data if we have your consent to do so. For example, if you provide us with data that is classed as a special category of Personal Data, such as health information, we will only process this with your permission (unless we feel the processing is necessary to protect your vital interests) and you have a right at any time to ask us to stop the processing of that specific data. Where you provide personal data about somebody else, for example, your referees, you should ensure that they have given their consent.

How we manage your special categories of Personal Data

Where we need to process special categories of Personal Data, this will only be done with your explicit consent (unless we feel the processing is necessary to protect your vital interests) or if we are obliged to process under employment or financial crime legislation.

Your rights

You have a number of other rights in relation to your personal data. For example, you can ask for a copy of your personal data through a Subject Access Request, you can ask for your information to be corrected if it is inaccurate, you can ask for the processing of your data to be restricted whilst we may be resolving an issue, and you can ask for your data to be deleted, and you have the right to data portability. See below for additional information. If you wish to exercise one of your rights please email us at dpo@moneybarn.com or write to Data Protection Officer at Moneybarn, Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ and we will review your request and come back to you within 30 days.

Your right to object

You have a right to object to any processing activity where the business states it has a legitimate business need to use your data in the way described. If you need to contact us please email us at dpo@moneybarn.com or write to Data Protection Officer at Moneybarn, Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ and we will review your request and come back to you within 30 days.

Your right to data portability

Data Protection legislation contains a right to data portability that may give you a right in some data processing contexts, to receive your personal data in a portable format when it is processed on certain grounds, such as consent. If you wish for this limited data to be "ported" to another organisation direct, please email dpo@moneybarn.com or write to Data Protection Officer at Version 1.3 13 November 2020



Moneybarn, Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ and we will review your request and come back to you within 30 days.

Obtaining a copy of your data

You have a right to access the personal data held about you. To obtain a copy of the personal data we hold about you, please email dpo@moneybarn.com or write to Data Protection Officer at Moneybarn, Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ and we will review your request and come back to you within 30 days.

Your right to lodge a complaint with the regulatory authority

We hope that we provide you with the service you expect in relation to how we manage your personal data. Please contact <u>careers@moneybarn.com</u> if there is anything you are concerned about and we will endeavour to address this. If you are still not satisfied, then you have the right to contact the Information Commissioner on 0303 123 1113.

Who do we share your data with?

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

Sometimes we use third party companies to help us administer your application to the company for example:

UK Credit Check: Equifax, ROI Credit Check: StubbsGazette, UK Fraud: CIFAS

All Criminal Checks are requested through Verifile. Jobs are checked by:

1. England/Wales: Disclosure & Barring Service

2. Scotland: Disclosure Scotland

3. NI: AccessNI

4. ROI: search of Court outcomes

All of these third parties are subject to the same Data Protection obligations and stringent requirements that we place in their contractual obligations with us, regardless of which country they are processing in.

Processing your data outside the UK and EEA

We sometimes use third parties who are based or who sub-process data outside of the UK and European Economic Area. We will always ensure they will protect your data to UK and EU standards.

If we do transfer your data outside of the UK and EEA, we will make sure that it is protected in the same way as if it was being processed in the UK and EEA by using one of the below safeguards:



- 1. Transfer it to a non-EEA country with privacy laws that give the same protection as the UK and EEA. You can learn more on the European Commission Justice website: https://ec.europa.eu/info/policies/justice-and-fundamental-rights_en
- 2. Put in place a contract with the recipient that means they must protect the data to the same standards as within the UK and EEA.

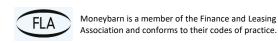
Sometimes these organisations may disclose information to foreign authorities in the fight against crime and terrorism where they are legally obliged to do so.

How long do we keep our data for?

If your application is successful, your information will be transferred into your employee record and subject to Moneybarn Limited's robust data protection controls. If you join you will be signposted to the Colleague Data Protection Notice to understand how your data will be processed and the retention periods that will apply to this data. If you are unfortunately not successful in your application or you decide not to accept a job offer, we will retain the information you provide (including personal data) for 12 months for the purpose of maintaining a database of potential suitable candidates and may contact you about any suitable opportunities in the future. 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.

Changes to this notice

We keep our applicant privacy notice under regular review. This notice was last updated 13/11/2020.



Moneybarn is a trading style of Moneybarn No. 1 Ltd, a company registered in England and Wales with company number 4496573, and Moneybarn Limited, a company registered in England and Wales with company number 2766324. The registered address for these companies is Athena House, Bedford Road, Petersfield, Hampshire, GU32 3LJ. Moneybarn Limited is authorised and regulated by the Financial Conduct Authority (Financial Services reference No. 702781). Moneybarn No.1 Limited is authorised and regulated by the Financial Conduct Authority (Financial Services reference No. 702780).