

# Candidate Privacy Notice

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## Document Information

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## 1. Introduction

First Intuition is committed to respecting your privacy. This notice explains how we comply with the law on data protection, what your rights are, and how we may use the personal information we collect before, during and after your relationship with us as a candidate.

This notice applies to our current and former candidates who wish to engage with us. This policy does not form part of any contract and is for informational purposes only. References to "FI", "we," "our" or "us" in this privacy notice are to First Intuition.

## 2. Contact Details

First Intuition's Data Protection Officer oversees our compliance with data protection legislation. Our ICO registration number is ZA057033.

Our contact details are the following:

Telephone: 0207 323 9636

Email: [dpo@firstintuition.co.uk](mailto:dpo@firstintuition.co.uk)

Postal Address: County House, Conway Mews, London. W1T 6AA.

## 3. Personal and Special Category Data

When you interact with FI in relation to your relationship with us a candidate, you may provide us with, or we may obtain, personal data about you.

We typically collect personal data about candidates through the recruitment process, either directly from them or sometimes from recruitment agencies, recruitment platforms, or background check providers. We may sometimes collect additional information from third parties including online business directories, previous employers, and credit reference agencies. This may also apply to independent contractors.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts, they have a right to know and to be aware of what personal information we hold about them, how we collect it, how we use it and how we may share that information. Please share this notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "Your Rights In Relation To This Processing" section below.

FI may also collect, store, and use the following "Special Categories" of more sensitive personal data regarding you:

- Information about your nationality, race, and ethnicity.
- Your religious beliefs.
- Your sexual orientation.
- Trade union membership information.
- Information about your health, including sickness absence records, any medical condition, health and sickness records, medical records, and health professional information.
- Biometric information about you, such as fingerprints or retina scans.

## 4. Data Collected, Processing Purposes, Lawful Bases, Data Sharing, and Retention Periods

Depending on the processing activity, we may rely on one or more of the following lawful bases for processing your personal data under the UK GDPR:

- Article 6(1)(a) which is where you have given us your consent to process your personal data.
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations. potential.
- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6(1)(e) for the performance of our public task.
- Article 6(1)(f) for the purposes of our legitimate interest.

When we process special category or criminal conviction data, we must also have additional conditions with which to do so.

The table below describes the main purposes for which we process your personal data, the categories of your information involved, and our lawful bases for being able to do this. Where special category and criminal conviction data is processed, the additional conditions we require to do this are also listed below. It also includes the types of organisations we share your personal data with and how long we keep your personal data.

Non-Special Category Personal Data				
Data Collected	Purpose	Lawful Basis	Data Sharing	Retention Period
Full name, Personal email address, Telephone/mobile number, Home address, Date of Birth, Employment history, Qualifications, Interview notes, References, Bank details, Interview notes	Recruitment	<ul style="list-style-type: none"> <li>• Contract</li> </ul>	<ul style="list-style-type: none"> <li>• Employees,</li> <li>• Suppliers / service providers</li> </ul>	30 days after end of process
Full name, Personal email address, Telephone/mobile number, Home address, Date of Birth, Employment history, Qualifications, Interview notes	Recruitment	<ul style="list-style-type: none"> <li>• Consent</li> </ul>	<ul style="list-style-type: none"> <li>• Employees,</li> <li>• Suppliers / service providers</li> </ul>	30 days after end of process
Biometric data (CCTV, photos),	Crime prevention and detection	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers / service providers</li> </ul>	30-days or longer if there is an incident

Special-Category Personal Data				
Data Collected	Purpose	Lawful Basis and Conditions	Data Sharing	Retention
Sexual orientation, Religious or Philosophical beliefs	Recruitment	<ul style="list-style-type: none"> <li>Consent</li> </ul>	<ul style="list-style-type: none"> <li>Employees,</li> <li>Suppliers / service providers</li> </ul>	30 days after end of process
		<ul style="list-style-type: none"> <li>Article 9(2) (a) Explicit consent</li> </ul>		

When we rely on the lawful basis of legitimate interest to process your personal data, we shall tell you what these legitimate interests are.

Where you have given us your consent to use your personal information, you have the right to withdraw this consent at any time. You may do this by contacting us as described in the "Contact Details" section above.

Please note that the withdrawal of your consent will not affect any use of the data undertaken before consent is withdrawn, and we may still be entitled to hold and process relevant personal information on bases other than consent. Withdrawing consent may also have the same effects as not providing the information at all, for example, we may no longer be able to provide certain services to you.

In some cases, you will have a legal, contractual, or other, requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to properly perform our contract with you or comply with legal obligations. In cases where you are not under obligation to provide such information, failing to provide it may still mean we are not able to properly perform our contract with you.

## 5. Recipients of Personal Data and International Transfers

FI is required to transfer the personal information provided by its service users to third parties to fulfil contractual obligations.

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

Appropriate safeguards for international transfers are:

- Adequacy decisions
- International Data Transfer Agreements (IDTA)
- Standard Contractual Clauses (SCC)

Please contact us using the details found in the "Contact Details" section for more information on our use of international transfers.

The following are categories of recipients that service user information could be transferred to:

Data Processor	Nature of Processing	Categories of Personal Data	Location of Data	Security Measures	Transfer Safeguard
Microsoft 365	Office productivity apps	Personal data is contained in office apps created by employees and stored in applicable cloud products.	UK	<a href="#">Microsoft compliance</a>	n/a
Workable	Application Tracking System	Full name, Personal email address, Telephone/mobile number, Home address, Date of Birth, Employment history, Qualifications, Interview notes, References, Interview notes	US	<a href="#">Workable Security</a>	DPF

In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors. For example, we may share information about you with HMRC for the purpose of collecting tax and national insurance contributions

Additionally, we are required under the Public Records Act 1958 (as amended) to transfer records to the National Archives (TNA) for permanent preservation. Some of these records may include the personal data of our current and former employees.

Full consideration will be given to Data Protection and Freedom of Information legislation when making decisions about whether such records should be open to the public.

## 6. Your Rights In Relation To This Processing

As an individual, you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner as the relevant supervisory authority.

For more information on your rights, please see 'Your rights as an individual'.

**Right of Access:** You have the right to obtain confirmation from us as to whether personal data concerning you are being processed and, where that is the case, access to that data.

**Right to Rectification:** You have the right to oblige us to rectify inaccurate personal data concerning you. Considering the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.

**Right to Erasure (Right to be Forgotten):** You have the right (under certain circumstances, but not all) to oblige us to erase personal data concerning you.

**Right to Restriction of Processing:** You have the right (under certain circumstances, but not all) to oblige us to restrict the processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.

**Right to Data Portability:** You have the right (under certain circumstances, but not all) to oblige us to provide you with the personal data about you in a structured, commonly used, and machine-readable format.

You also have a right to oblige us to transmit those data to another controller.

**Right to Withdraw Consent:** If the lawful basis for processing is consent, you have the right to withdraw that consent.

**Right to Object to Direct Marketing:** Where your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

**Rights in Relation to Automated Decision-Making and Profiling:** FI does not perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

You should note that some of these rights, for example, the right to require us to transfer your data to another service provider or the right to object to automated decision-making, may not apply as they have specific requirements and exemptions which apply to them, and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision-making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute right.

**Your Right to Lodge a Complaint with a Supervisory Authority** If you wish to exercise any of your rights concerning your personal data, you should contact FI's Data Protection Officer at the address shown above. If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is Information Commissioner's Office:

Information Commissioner's Office
Telephone: 0303 123 1113
Email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>
Web: <a href="https://ico.org.uk/for-the-public/">https://ico.org.uk/for-the-public/</a>
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details the "Contact Details" section above.

**\*\* END OF DOCUMENTATION \*\***