



Recruitment Privacy
Notice: Processing of
Personal Data

March

2019



- 1 **Contact details:** Your personal information is collected by CFC Underwriting Limited ("we"/"us"/"our"). You can contact us at:

HR Manager, 7th floor, 85 Gracechurch Street, London, EC3V 0AA, United Kingdom, Tel. No. +44 (0) 207 220 8500, Email: recruitment@cfcunderwriting.com .

If you have any questions or complaints in relation to the use of your personal information or this Recruitment Notice, you can contact our Data Protection Officer, currently Michael Grist, Chief Financial Officer, Tel: 0207 220 8500, email: mgrist@cfcunderwriting.com.

- 2 **Personal Information Collected:** We collect, the information below about you during the recruitment and selection process. If you fail to provide certain information when requested we will not be able to progress your application.

- Information provided in your curriculum vitae, application form, covering letter and during the interview process including: your name, date of birth, age, gender, home address, personal email address, education, qualifications and work experience details, and references.
- Information collected or created by us during the recruitment process including: correspondence between us, interview notes and test scores (where applicable).
- Information about criminal convictions: For designated roles we will carry out background checks and checks on publicly available social media as part of the recruitment process.
- Special categories of personal data including: Racial and ethnic origin information and information relating to disabilities, religious beliefs or sexual orientation, physical or mental health information and immigration/naturalisation records (if this discloses racial/ethnic origin information).

- 3 **How we use personal information:** We use your personal information to progress the recruitment process, assess and make a decision about your suitability for a role, to communicate with you and to carry out reference checks. We will also use your information to comply with legal and regulatory requirements.

- 4 **Sources of Information:** This information is either (a) provided by you; (b) obtained from third parties through the application and recruitment process such as employment agencies and including **Sterling Talent Solutions UK Limited**, located at 8th Floor Alexandra House, 1 Alexandra Road, Swansea SA1 5ED, Tel: 01792 478838, who we have engaged to conduct pre-employment checks; or (c) created by us in the course of the recruitment process.

- 5 **Why we use personal information:** We will use the information collected from you because: (1) it is necessary for us to do so before entering into a contract with you; (2) we need to process your information in order to comply with a legal or regulatory obligation; or (3) because we or a third party have a legitimate interest to: (a) ensure the effective administration and management of the

recruitment process; (b) ensure we hire a suitable individual for a role; (c) deal with disputes and accidents and take legal or other professional advice; and (d) ascertain your fitness to work.

- 6 **How we use special category personal information:** We will process your special categories of personal data (1) to consider whether we need to provide appropriate adjustments during the recruitment process and to ascertain your fitness to work; (2) for equal opportunity monitoring purposes; or (3) to comply with any legal or regulatory obligation.
- 7 **Why we use special category personal information:** We will use special categories of personal information collected about you because: (1) we need to do so to carry out our legal obligations; (2) it is necessary for the establishment, exercise or defence or legal claims on in relation to court cases; (3) there is a substantial public interest; (4) it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.
- 8 **Information about criminal convictions:** As part of the recruitment process for designated roles we ask you for information in relation to [unspent] criminal convictions and we carry out criminal background checks. We use this information and these checks (1) to assess your suitability for a regulated role; (2) to protect your interests, our interests and third party interests; (3) because it is necessary in relation to legal claims. We are allowed to use your personal information in this way where you have provided your consent.
- 9 **Information that we share:** We will only share your personal information with the following third parties for the purposes of processing your application: (1) employment agencies, (2) background check and online test providers including **Sterling Talent Solutions UK Limited**, located at 8th Floor Alexandra House, 1 Alexandra Road, Swansea SA1 5ED, Tel: 01792 478838, (3) credit reference agencies and (4) regulators and competent authorities. We will also share personal data within our group for the purposes of administration, accounting and reporting purposes.
- 10 **Retention of your information:** We will retain your personal information for the duration of the recruitment process and for the length of any applicable limitation period for claims which might be brought against us later. If you are successful in applying for a position, your personal information will be retained for a further period, as set out within our Employee Privacy Notice.
- 11 **Where your information will be held:** We may transfer the personal information we collect about you to the locations of our group companies, including the locations of our group companies inside the EU, and our pre-employment checks service provider, **Sterling Talent Solutions UK Limited**, located at 8th Floor Alexandra House, 1 Alexandra Road, Swansea SA1 5ED, may transfer such information to Canada, India, Ireland, Philippines and US for the purposes of administering the recruitment process subject to implementing appropriate safeguards. If you would like to obtain copies of such safeguards you can request them from us on the contact details above.

Your rights: You have the following rights in connection to your data: the rights of access, correction, erasure, objection, restriction, transfer, and the right to withdraw consent and to complain to a Supervisory Authority.