

DATA PROTECTION NOTICE FOR APPLICANTS



1. Introduction

This notice is intended to explain how your Personal Data will be handled by the Company (defined below) and sets out the information including the personal information detailed below relating to you ("Personal Data") that will be collected and processed by the Company and/or on its behalf by its third party service providers in the context of your job application and, if your application is successful, in the context of any ensuing offer of employment. Personal data means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).

If an offer of employment is made to, and accepted by, you, the Company will provide you with a copy of its Data Protection Notice for Employees at the appropriate time.

Where any information in relation to criminal convictions or offences will be collected and processed you will also be provided with a copy of our Criminal Records Information Notice.

For the purposes of this notice, the controller of your Personal Data is Pepper Money (PMB) Limited, of registered office address 4 Capital Quarter, Tyndall Street, Cardiff, Wales, CF10 4BZ ("Pepper Money", "the Company", "we" or "us"). This means we are responsible for deciding how we hold and use Personal Data about you for the purposes of the recruitment exercise.

Pepper Money belongs to the Pepper Money UK Group and the global Pepper group of companies ("Pepper Group Entities"), a group of different legal entities located around the world. You can find more details about the Pepper Group here: <https://www.pepper.money/about-us/>

If you have any questions regarding the content of this notice, please contact the DPO using DPOPhilippine.Office@pepper.money

2. Data protection principles

We will comply with data protection law which requires that the Personal Data that we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. Scope

This notice applies to every individual who applies or has applied for a job at the Company (whether a temporary or fixed term role or secondment) and includes applicants for all types of roles such as consultants, representatives, vendor, casual workers, contractors,

contract workers and those on work placements. It also applies to successful candidates to whom an offer of employment has been made, but whose role with the Company has not yet commenced.

This notice applies to you if you make an application via a vendor (recruitment agency), ATS (Applicant Tracking System) colleague referral, job board, direct application via email or post, or in person.

4. The kind of information we hold about you

We may collect, store, and use the following categories of Personal Data about you:

- **Personal contact details** such as name (including previous names), title, addresses, telephone numbers and personal email addresses;
- **Professional Information** including details of your skills, experience and employment history (including job titles, salary and working hours) or periods of unemployment, and/or any other Personal Data on your curriculum vitae (CV), an application form or any other documents you supply to us;
- **Information from interviews** (including in person, online and/or via the telephone) that you may have with us;
- **Information from the selection process** (including test results, psychometric testing, behavioural assessment or any other type of assessment e.g. technical).
- **Information about your current level of remuneration**, including benefit entitlements;
- **Information about your right to work** in the Philippines; and

We may collect, store, and use the following special categories of Personal Data about you:

- **Details of your education** including qualifications certificates and/or professional memberships*
- **Criminal records information** including but not limited to Police checks & National Bureau of Investigation (NBI) clearance*
- **Personal details** such as Date of birth, Social Security Numbers; Marital status and dependents.
- **Health information** including information regarding any 'reasonable adjustment' you would like to be considered at the interview stage or to complete assessments as part of the recruitment process, as a result of health or disability.
- **Your nationality and immigration status** and information from related documents, such as your passport, visa or other identification and immigration information; and/or
- **Financial History Information** that you provide on application or during interview relating to credit history or criminal convictions and the results of background checks undertaken for a role.
- **Diversity monitoring information**, including information about your gender, ethnic origin, sexual orientation, health and religion or beliefs.

Please note that some of the information listed above will only be collected if you are shortlisted and/or successful in being offered a role with us.

*Note this is only relevant to specific roles and these will be detailed on the job advert and discussed at interview (e.g. roles with access to customer or colleague data)

5. How we collect the information

We may collect Personal Data directly from you, via our website links, recruitment

agencies, talent assessment platforms, background check providers, your referees (details of whom you will have provided), educational institutions you have attended, the relevant professional bodies, Local and/or national police databases, national bureau of investigation, credit search agencies, the relevant fraud sharing mechanisms, the Department of Labor and Employment (DOLE) and Bureau of immigration.

6. Why we collect the information and how we use it

We will only use your Personal Data when the law allows us to. We will typically collect and use Personal Data for the following purposes:

- for assessing your suitability for roles with us (a legitimate interests; assessment of candidate's competence; ensuring fair and consistent recruitment practices)
- for the performance of a contract with you, or to take steps to enter into a contract; (including with the wider Pepper Group)
- for compliance with a legal or regulatory obligations (e.g. our obligations to you as your employer under employment protection and health safety legislation, and under statutory codes of practice, such as those issued by the Department of Labor and Employment (DOLE) or to fulfil the firms obligations as a regulated firm);
- for the purposes of our legitimate interests or those of a third-party (such as a benefits provider), but only if these are not overridden by your interests, rights or freedoms.

We may also use your Personal Data in the following situations, which are likely to be rare:

- The data subject has given his or her consent, specific to the purpose prior to the processing, or in the case of privileged information, all parties to the exchange have given their consent prior to processing;
- The processing is necessary to protect the life and health of the data subject or another person, and the data subject is not legally or physically able to express his or her consent prior to the processing.

7. Situations in which we will use your Personal Data

We need the below categories of information in the list above primarily to allow us to assess your suitability for roles with us and should you be successful to enter into a contract/performance of a contract with you. In some cases, we may use your Personal Data to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your Personal Data are listed below. We have indicated the purpose or purposes for which we are processing or will process your Personal Data, as well as providing a description of which categories of data are involved (identified in **bold** in the above list). Where a legitimate interest is involved, we state what the legitimate interest is.

Activity	Category of data	Purposes (Legal Basis)
Assessing suitability for roles	<ul style="list-style-type: none"> • Contact Details • Information contained in CVs, cover letters and/or application forms • Assessment (e.g. interviews, behavioural assessments) 	<p>For Performance of a contract or entering a contract</p> <p>The processing of personal information is necessary and is related to the fulfilment of a contract with the data subject or in order to take steps at the request of the data subject</p>

		<p>prior to entering into a contract;</p> <p>Legitimate interests; assessment of candidate's competence; ensuring fair and consistent recruitment practices</p> <p>Compliance with a legal obligation; ensuring hiring processes are fair, equitable, and free from discrimination.</p> <p>Consent where processing sensitive information</p>
Entering into and the Performance of your Contract of Employment	Information required to undertake background checks (e.g. name, address(es) history, date of birth, gender, Social Security details, qualifications/professional memberships) following offer of a role with us	<p>Consent where processing sensitive information</p> <p>For Performance of a contract or entering a contract The processing of personal information is necessary and is related to the fulfillment of a contract with the data subject or in order to take steps at the request of the data subject prior to entering into a contract;</p> <p>Legitimate interests; assessment of candidate honesty, integrity; preventing and detecting unlawful acts to protect the public against dishonesty, where it is necessary for the purposes of complying with a regulatory requirement or for the purposes of preventing fraud or a particular kind of fraud.</p>

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data

IMPORTANT:

In the event that you do not wish to provide us with your Personal Data for the above Purposes, we will not be able to process your job application or, if you are a successful candidate, to make you an offer of employment.

8. How we may share the information

We may also need to share some of the above categories of Personal Data with other parties, such as other companies within the Pepper Group Entities, recruitment/HR consultants, professional advisers, benefits and insurance providers, payroll

administrators, credit search and fraud agencies, and other relevant third parties. Where possible, information will be anonymised.

The recipient(s) of the information will be bound by confidentiality obligations. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. We may also be required to share some Personal Data with our regulators or as required to comply with the law.

9. How long we keep your information

If your application is unsuccessful, we will retain your personal data collected during the application process in an applicant's file in line with the Company's data retention policy, which is for a period of 3 (three) months from the date of your application unless you request that it is deleted earlier than that. In the event that your application was made via a vendor (recruitment agency) we will retain your personal data collected during the application process in an applicant's file in line with the Company's data retention policy, which is for a period of up to 12 (twelve) months from the date of your application.

Your personal data is retained on file for that period to enable us to review your details against future vacancies that may arise during that period and/or to fulfil our contractual obligations to our vendor partners.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment, including the fulfilment of the contract and meeting our legislative and regulatory requirements. For further information, see our Data Protection Privacy Notice (Employment).

If we wish to retain your Personal Data on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your Personal Data for a fixed period.

10. Transfers Outside the Philippines

We may transfer your Personal Data to other Pepper Group Entities which operate in the United Kingdom

We may transfer Personal Data to third-party recipients outside of the Philippines for the purposes set out in section 4. If Personal Data is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by the standards set out in the EU General Data Protection. If we transfer outside of the EU or EEA, we will make sure that suitable safeguards are in place before doing so.

Where such transfers occur: a) they will not occur without our prior written authority; and b) such transfers of your Personal Data will be subject to the Standard Contractual Clauses under applicable data protection.

11. Your Acknowledgment of this Notice and Your Rights

Under applicable data protection laws, you have a number of important rights. We have summarised these below:

NOTE: We encourage you to read this section

Access	In certain circumstances, you have a right to object to our processing of your Personal Data where we process it for our legitimate business interests. We may not be able to comply with such a request where there are legitimate grounds for the processing that override your interests, rights and freedoms or where the processing of your Personal Data is required in connection with the defence, establishment or exercise of legal claims
Rectification	Rectification of your personal data. This is your right to have your personal data corrected if it is inaccurate or incomplete
Erasure	<p>In certain circumstances, erasure or order blocking of your personal data whenever warranted</p> <p>For example, you may exercise this right in the following circumstances:</p> <ul style="list-style-type: none"> • your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by us; • where you withdraw consent and no other legal ground permits the processing; • where you object to the processing and there is no overriding legitimate grounds for the processing; • where your Personal Data has been unlawfully processed; or • where your Personal Data must be erased for compliance with a legal obligation. <p>Where we store your Personal Data for statistical purposes, we may not be able to comply with such a request where it would likely impair such statistical purposes or where we require your Personal Data for compliance with a legal obligation or in connection with legal proceedings</p>
Object	The right to object if the personal data processing involved is based on consent or on legitimate interest;
Right to Data Portability	<p>The right to data portability through which you may obtain and electronically move, copy, or transfer your data securely for further use</p> <p>Note that no processing is carried out by automated means in the context of the Company's relationship with you.</p>

If you would like to exercise any of your rights detailed above, please contact our Data Protection Officer whose contact details are set out in section 12 of this notice.

When you apply for a role with us, you provide your consent to us processing your Personal Data for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have

withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

12. Your right to correct and access your information and ask for it to be erased

Please contact the DPO using DPOPhilippine.Office@pepper.money .(in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask for some, but not all, of the information we hold and the process to be erased (the 'right to be forgotten') in certain circumstances. We will provide you with further information about the right to be forgotten.

13. Keeping your personal data secure

We have appropriate security measures in place to prevent Personal Data from accidental loss, or from being used or accessed in an unauthorised way. We limit access to your Personal Data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

14. Use of your Personal Data by Credit Reference Agencies

We and/or background check providers acting on our behalf may supply your Personal Data to credit reference agencies (CRAs) who will give us/ the background check provider information about you, such as about your financial history. We and/or the background check provider may do this to assess creditworthiness, check your identity, trace and recover debts and prevent criminal activity.

We and/or the background check provider may also continue to exchange information about you with CRAs on an ongoing basis, including any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, or other financial associates.

14. Concerns Regarding your Personal Data

If you have any concerns about the way your Personal Data is being used or processed by the Company or you are not satisfied, please contact our DPO in writing using DPOPhilippine.Office@pepper.money

If you are not satisfied by the effort and response from the Company, you have the right to lodge a complaint with the National Privacy Commission. Full details on how to do this may be accessed on the NPC website: <https://privacy.gov.ph/right-to-file-a-complaint/>

15. How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about

our use of your information. If not, contact the National Privacy Commission at <https://privacy.gov.ph/right-to-file-a-complaint/> or telephone +632 5322 1322, then 114 or 115 for the Complaints and Investigation Division for further information about your rights and how to make a formal complaint.

16. Changes to this Notice

We may amend this Data Protection Privacy Notice for Applicants from time to time, in whole or in part, at our sole discretion, and any changes to this notice will be effective immediately upon publishing the revised notice.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you, and you will have a choice as to whether or not we use your information in the new manner.

This notice was last updated on 6th May 2025

If you have questions or concerns about this notice, please contact HR using DPOPhilippine.Office@pepper.money the first instance.