

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/>

See section 9 of this notice for the contact details of our Data Protection Officer.

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, agency, 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 recruitment agency, ATS (Applicant Tracking System) colleague referral, job board, direct application via email or post, or in person.

4. How and Why We Process Your Personal Data

We will 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;
- Details of your qualifications, 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 UK; and
- Date of birth;
- Marital status and dependents;
- Next of kin and emergency contact information;
- information regarding your credit history, information you provide on application or during interview relating to credit history or criminal convictions and the results of any Disclosure and Barring Service (DBS) or fraud checks (please see Appendix 1);
- Your national insurance number;
- Proof of address e.g. a recent bill or redacted bank statement; and/or
- A copy of your driver's license.

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

- Information regarding your criminal record, and Disclosure and Barring Service (DBS) certificates;
- 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

- 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.

How is your Personal Data collected?

We may collect Personal Data directly from you, via our website links, recruitment agencies, talent assessment platforms, graduate/internship programme providers, background check providers, your referees (details of whom you will have provided), your education provider, the relevant professional body the Disclosure and Barring Service (DBS), credit search agencies, the relevant fraud sharing database (see Appendix 1), the Department of Work & Pensions, and the Home Office.

Legal basis and purpose of processing

The following tables detail how ("Legal Basis") and why ("Purposes") we process your Personal Data. These tables also describe those recipients (and categories of recipients) with whom we may share your Personal Data ("Recipients") and the period for which your Personal Data may be stored ("Retention").

We encourage you to read this section.

| Necessary for the Entering into and the Performance of your Contract of Employment | |
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| Purposes | <p>We obtain, collect and process your Personal Data to:</p> <ul style="list-style-type: none"> • process your job application, which includes behavioural and other assessment, contact you in relation to interviews, and/or conduct background checks, and/or offer you a job after the interview stage; • process any references you provide to us in the context of recruiting you and relevant background checks; • plan for the future of the business, including succession planning and strategic growth. |
| Legal Basis | It is necessary to process the Personal Data in order for us to consider whether we may enter into a contract of employment with you. |
| Recipients | <p>Personal Data may be disclosed for these purposes to Pepper Group Entities and/or our third-party service providers. These Recipients may include:</p> <ul style="list-style-type: none"> • one or more financial institutions; • IT system and network providers; • our professional and legal advisers, medical advisers including occupational health professionals, insurance providers, auditors and regulators; • background check providers; • hiring managers; • relevant colleagues e.g. HR, Compliance, Facilities; • recruitment providers and agencies; • talent assessment platform providers; • graduate/internship programme providers; and/or • employment support programmes (e.g. Access to Work); • facilities providers (e.g. property management companies); • outsourced business continuity consultants. |

| Necessary for the purposes of our Legitimate Interests | |
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| Purpose | <p>We obtain, collect and process your Personal Data to:</p> <ul style="list-style-type: none"> • process your job/candidate application, including behavioural and other assessment, contact you in relation to interviews and/or offer you a job after the interview stage; • process any references you provide to us in the context of recruitment; • carry out relevant background checks; and • to assess your suitability for a role by reviewing your qualifications and any other information you have provided to us. |
| Legal Basis | We have a legitimate business interest to process your Personal Data for the above purposes. Where we process your Personal Data for |
| | these purposes, we carefully balance our legitimate business interest with your right to privacy. |
| Recipients | <p>Personal Data may be disclosed for these purposes to Pepper Group Entities and/or our third-party service providers. These Recipients may include:</p> <ul style="list-style-type: none"> • our professional and legal advisers, medical advisers including occupational health professionals; • insurance providers, auditors and regulators; • background check providers; • Fraud Prevention Agencies; • hiring managers; • recruitment providers and agencies; • talent assessment platform providers; and/or • graduate/internship programme providers • employment support programmes (e.g. Access to Work) |
| Compliance with Legal Obligations to which we are subject – Your Personal Data Purpose | |
| Purpose | We obtain, collect and process your Personal Data in order to comply with the legal obligations imposed on us under applicable legislation. |
| Legal Basis | It is necessary for us to process your Personal Data in order to comply with the legal obligations which apply to us as a potential employer and a regulated entity engaged in a recruitment process. |

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| Recipients | <p>The Personal Data that you provide in your application will be disclosed to recipients including but not limited to Fraud Prevention Agencies, Company Human Resources team, Company Finance team, legal advisers, government agencies, medical advisers including occupational health professionals, insurance providers, employee benefit providers.</p> <p>We will provide your name and email address to third party background check providers who will contact you directly to collect additional data directly from you. That information will be processed for the purpose of performing background checks on our behalf.</p> <p>The background check providers will provide you with a copy of their privacy notice which will detail how and why they may process the Personal Data they collect from you.</p> |
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| Compliance with other Legal Obligations to which we are subject – Special Categories of Your Personal Data | |
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| Purpose | We obtain, collect and process special categories of your Personal Data (e.g. data concerning your health, disability status, ethnic origin and religious background) in order to comply with legal obligations which are imposed upon us under employment law or to ensure meaningful equal opportunity monitoring and reporting. |
| Legal Basis | It is necessary for us to process special categories of your Personal Data in order to comply with employment law. |
| Recipients | The Personal Data that you provide in your application will be disclosed to recipients including but not limited to the Company Human Resources team, Company Finance team, line manager/hiring manager, HMRC, legal advisers, government agencies, medical advisers including occupational health professionals, employment support programmes (e.g. Access to Work) insurance providers and employee benefit providers. |

| Compliance with other Legal Obligations to which we are subject – Criminal Convictions Data | |
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| Purpose | We may need to carry out criminal record checks for those carrying out roles that have access to personal customer and/or colleague data. |
| Legal Basis | It is necessary for us to process your criminal record information for the purposes of preventing or 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. |

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| Recipients | The Personal Data that you provide in your application will be disclosed to recipients the Company Human Resources team, line manager/hiring manager, Pepper Group Entities, umbrella bodies (an umbrella body being a registered body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations), IT system and network providers, our professional and legal providers, medical advisers and occupational health professionals, auditors and regulators. |
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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.

5. 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, Welsh Assembly Government, Welsh European Funding Office, Wales Contact Centre Forum, credit search and fraud agencies, and other relevant third parties. Where possible, information will be anonymised.

We may need to share this data for a number of reasons such as to update you on the progress of your application, offer you a role, fulfil the employment contract, provide suitable benefits, enable pre-employment checks to be completed or for internal reporting purposes. This list is not exhaustive.

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.

6. 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 6 (six) 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 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 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 agency 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 on that basis

7. Transfers outside the UK

We may transfer your Personal Data to other Pepper Group Entities which operate in the UK.

We may transfer Personal Data to third-party recipients outside of the UK 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.

8. 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

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| Right to Object to Processing | 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 |
| Right of Access | You may access and obtain a copy of your Personal Data. |
| Right to Rectification | You may request that we correct any inaccuracies in your Personal Data or amend it if it is incomplete. |

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| Right to Erasure | <p>In certain circumstances, you have the right to request that we erase your Personal Data.</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. |
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| | <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> |
| Right to Restriction | <p>You have the right to restrict our processing of your Personal Data where any of the following circumstances apply:</p> <ul style="list-style-type: none"> • where you consider that the Personal Data that we hold about you are not accurate. This restriction will be in place for a period sufficient to enable us to verify the accuracy of your Personal Data; • where the processing is unlawful and you do not want your Personal Data to be erased, so request the use be restricted instead; • where we no longer need to process your Personal Data (e.g. any of the Purposes outlined above have been completed or expire), but we expect it is needed in connection with the defence or establishment of legal proceedings; • where you have objected to our processing of your Personal Data pending the assessment as to whether or not our legitimate business interests undermine your interests, rights and freedoms. <p>Where you exercise your right to restrict our processing of your Personal Data, we will only continue to process it with your consent or in connection with the defence or establishment of legal proceedings or for the protection of the rights of other people or for reasons of important public interest.</p> |

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| Right to Data Portability | <p>You may receive or arrange for transfer of the Personal Data that you provide to us in a structured, commonly used and data in a data format that can automatically be read and processed by a computer where we process your Personal Data on the basis of consent or where processing is carried out by automated means. Where you make such a request, we will transfer your Personal Data to a controller of your choice (if it is feasible for us to do so).</p> <p>Note that no processing is carried out by automated means in the context of the Company's relationship with you.</p> |
| Right to Object to Automated Decision-Making, including profiling | <p>You have a right not to be subjected to decisions based solely on automated decision-making, including profiling, which produces legal effects concerning you or similarly significantly affects you. We may not be able to comply with such a request where we rely on your explicit consent or where it is necessary to enter and perform our contract with you (as detailed in section 2 above). You may request a person from our team to review the decision so that you can query it and set out your point of view and circumstances to us.</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 9 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.

9. Your rights to correct and access your information and ask for it to be erased

Please contact our Data Protection Officer (DPO) at DPO@pepper.money if (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 our Data Protection Officer for some, but not all, of the information we hold and the process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten.

10. 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.

11. 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.

The identities of the CRAs, and the ways in which they use and share Personal Data, are explained in more detail on their websites – clicking on any of these three links will also take you to the CRAIN document: TransUnion (formerly Callcredit) [Privacy Centre \(transunion.co.uk\)](https://www.transunion.co.uk/privacy-centre); Equifax <https://www.equifax.co.uk/crain>; Experian [Credit Reference Agency Information Notice \(CRAIN\) | Experian](https://www.experian.co.uk/credit-reference-agency-information-notice-crain). Please note: We accept no responsibility or liability for the contents of any third-party website to which a hypertext link exists and give no representation or warranty as to the information on such websites.

12. Use of your Personal Data by Fraud Prevention Agencies

The Personal Data we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected, you could be refused certain services or employment. Your Personal Data will also be used to verify your identity

Further details of how your information will be used by us, Cifas and other fraud prevention agencies, and your data protection rights, can be found by contacting our Human Resources team on 03333 701 101, by email at people@pepper.money, or in person.

13. 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 Data Protection Officer in writing at: Pepper Money (PMB) Limited

Correspondence address: 4 Capital Quarter, Tyndall Street, Cardiff, CF10
4BZ Email: DPO@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 Information Commissioner's Office. Full details on how to do this may be accessed on the ICO website: <https://ico.org.uk/concerns/>.

14. 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 Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

15. 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 19 December 2023

If you have questions or concerns about this notice, please contact our Data Protection Officer.

APPENDIX 1 - Fraud Data Bases

General

1. We will check your details against the Cifas databases established for the purpose of allowing organisations to record and share data on their fraud cases, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct ("Relevant Conduct") carried out by their staff and potential staff. "Staff" means an individual engaged as an employee, director, trainee, homeworker, consultant, contractor, temporary or agency worker, or self-employed individual, whether full or part time or for a fixed term.
2. The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and other relevant conduct and to verify your identity.
3. Details of the Personal Data that will be processed include name, address, date of birth, any maiden or previous name, contact details, document references, National Insurance Number, and nationality. Where relevant, other data including employment details will also be processed.
4. We and Cifas may also enable law enforcement agencies to access and use your personal data to detect, investigate, and prevent crime.
5. We process your personal data on the basis that we have a legitimate interest in preventing fraud and other Relevant Conduct, and to verify identity, in order to protect our business and customers and to comply with laws that apply to us. This processing of your personal data is also a requirement of your engagement with us.
6. Cifas will hold your personal data for up to six years if you are considered to pose a fraud or Relevant Conduct risk.

Consequences of Processing

7. Should our investigations identify fraud or any other Relevant Conduct by you when applying for or during the course of your engagement with us, your new engagement may be refused or your existing engagement may be terminated or other disciplinary action taken (subject to your rights under your existing contract and under employment law generally).
8. A record of any fraudulent or other Relevant Conduct by you will be retained by Cifas and may result in others refusing to employ you. If you have any questions about this, please contact us using the details provided.

Data Transfers

9. Cifas may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then Cifas will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

Your Rights

10. Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data, request that your personal data is erased or corrected, and request access to your personal data.
11. For more information or to exercise your data protection rights, please contact us using the contact details provided.
12. You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data