Recruitment Privacy Policy

As part of our recruitment process CX Services Ltd collects, processes and stores personal information about you. We process this information in relation to the recruitment process. This document outlines:

- Why we collect your personal information;
- What information is collected and;
- How it is processed within the recruitment process.

Throughout this Recruitment Privacy Notice we use the term "processing" to cover all activities involving your personal information, including collecting, handling, storing, analysing, sharing, accessing, using, transferring and disposing of the information.

1) Why do we collect your personal information?

In order to manage your application, we need to process certain personal information about you. The purposes for this are set out below. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements. Not all of the purposes set out below will apply to you all of the time.

- Application: CV, name, address, email address, contact telephone number, employment history, academic and professional qualifications.
- Selection Process: CV, application form, psychometric tests, interview (face to face, telephone or video), behavioural assessments (such as a role play, group exercise or presentation), technical assessments;
- Pre-employment screening: Gender, Marital Status, Age, Ethnicity, disability, sexual orientation, Religious beliefs, Caring responsibility, county court judgements, credit history.

2) What personal information might we process?

Here are some examples of the type of information we may process.

- Personal details such as name, address, date and place of birth;
- Work history/job data; previous employers, positions, dates, etc.
- Education and work history including professional qualifications and skills;
- Employer feedback / references to include regulated references where necessary;
- Nationality / visa / right to work permit information; (e.g. passport, birth certificate, driving licence, National Insurance numbers)
- Results of Pre-employment screening checks (e.g. credit history, criminal records checks where permitted under local law)
- Assessment results e.g. psychometric assessment results, results from interview, video or telephone assessments.

3) Who do we share your personal information with?

CX Services Ltd will need to share your personal information internally with hiring managers.

The recruitment process will involve:

- Assessing and progressing your application,
- Assessing your suitability for the position (skills, strengths, behaviours for the role)

To enable these processes your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your personal information may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf;
- Employees in HR who have responsibility for HR processes (for example recruitment, assessment, pre-employment screening);
- Employees in IT who manage user access;
- Audit and Investigations employees in relation to specific audits/investigations; and
- Security managers for facilities / premises.

CX Services Ltd may also need to share your information with certain external third parties including:

- Suppliers who undertake background screening on behalf of CX Services Ltd (credit checking agencies, Motor Insurance Broker, criminal checking bureaus, etc.)

3) How do we protect your information?

Our systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur. This is done in accordance with the **CX Services Ltd Privacy Notice**.

4) Your Rights

You are entitled to see the information the CX Services Ltd holds about you. You can also request changes to be made to incorrect information. You can ask for information to be deleted or blocked if you legitimately think that CX Services Ltd shouldn't be processing that information, is processing it incorrectly.

If you have any queries about this notice or your personal information generally, including questions about accessing your personal information or correcting it, you should contact HR about your right to make a "subject access request".

5) Screening checks

As part of the Selection process, CX Services Ltd performs a number of screening checks. These checks are only performed for candidates who have been selected for a role. Your consent will be requested before screening checks are performed.

6) Credit reference agencies

We will undertake searches about you at credit reference agencies who will supply us with information, including information from the electoral register, in support of our recruitment decision. The agencies will record details of the search but will not make them available for use by lenders to assess your ability to obtain credit. We may use scoring methods to assess this application and to verify your identity.

You have the right of access to your personal records held by credit reference agencies. We will supply their names and addresses upon request.

7) Regulatory screening

In order to comply with our legal and regulatory obligations in relation to anti-money laundering and sanctions restrictions, we will screen your name against global sanctions lists. The screening will simply involve searching our internal and third party databases to ensure you are not on a sanctioned list. We are not able to employ anyone on a sanctions list. In addition, in order to comply with our legal obligations relating to anti-bribery and corruption,

we will also perform searches and ask questions to assess whether there is a potential bribery or corruption risk to the role based on your personal and political associations. If there is a risk we assess what additional internal controls we need to put in place to reduce that risk.

11) Processing Conditions

CX Services Ltd's entitlement to process your personal information is governed by a number of processing conditions. This means that we may rely on more than one of these conditions in order to process elements of your personal information throughout the recruitment process.

- CX Services Ltd will process your personal information in the administration of your application.
- CX Services Ltd will also process your personal information where it is required by law or regulation or it is in the legitimate interests of the applicant or CX Services Ltd. This processing will always be fair and lawful and will at all times comply with the privacy laws of the UK.

Full list of information we may process during the recruitment and subsequent employment period.

- Name, work and home address and contact details
- Date and place of birth
- Education and work history
- Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, disability, work permit, date and place of birth or gender)
- Health issues requiring adaptations to working environment
- Job title, grade and job history
- Employment contract related information (including compensation, location, hours of work and so on)
- Reporting and managerial relationships
- Leaves of absence (such as maternity leave, sickness absence)
- Photograph(s)
- Disciplinary / grievance records
- Time and attendance details
- Bank account details for salary payment purposes
- Expenses such as travel and expenses claimed from CX Services Ltd
- Skills and qualifications
- Training history and plans
- Results of original and ongoing employee screening
- Details provided in relation to Conduct policies (such as conflicts of interest, personal account dealing, trade body membership and so on)
- Health & safety incidents, accidents at work and associated records
- Building CCTV images
- Audio recordings of telephone interviews
- Video recordings of interviews
- Notes from face to face interviews
- Psychometric test results and associated reports
- Results from technical assessments

These categories of information might potentially include some sensitive personal information. Sensitive personal information is not routinely collected about all applicants, it may be collected where CX Services Ltd *has a legal obligation to do so, or if you choose to disclose it to us during the course of your relationship with* CX Services Ltd.

12) Data Retention and Deletion

CX Services Ltd will retain all documentation including personal information for a period not exceeding three months after the completion of the recruitment process if you are unsuccessful in your application and for a period not exceeding two years following the termination of your employment in the event you are employed by CX Services Ltd whether on a permanent or temporary contract except as follows:-

- You are unsuccessful in your application but you have confirmed in writing or by email that you would like CX Services Ltd to keep your details on file in case a similar opportunity arises going in the future. In such cases your details will be held for a period not exceeding two years from the completion of the recruitment process.

- There are certain legal requirements to hold key attributes of your employment details in which case such data will be held for a specified statutory period which in all cases does not exceed seven years from the tax year end in which you leave the employment of CX Services Ltd.

At the end of any data retention period, digital data is securely and permanently deleted from the CX Services Ltd systems. All paper records are securely shredded.

CX Services Ltd is registered in Scotland, company registration number SC617655 with registered address of Unit 14, Highland Avenue, Dunoon, Argyll, PA23 8PQ.