

## GDPR Candidate Privacy Notice (UK)

### WHAT IS THE PURPOSE OF THIS DOCUMENT?

Raphaels Bank is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this **privacy notice** because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will 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.

### THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- Any information you have provided on an application form or via our online recruitment portal, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview.
- We may also collect, store and use the following "special categories" of more sensitive personal information:
  - Information about your race or ethnicity, religious beliefs, sexual orientation as part of our equal opportunities monitoring.
  - Information about your health, including any medical condition, health and sickness records.
  - Information about criminal convictions and offences.

#### Head Office

Raphaels Bank is a registered trading name for R. Raphael & Sons plc.

Head Office: 19-21 Shaftesbury Avenue, London, W1D 7ED.

R. Raphael & Sons plc is Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, Registration No. 161302.

## HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate and if applicable a recruitment agency, from which we collect the following categories of data: CV, name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Experian from which we collect the following categories of data: Credit check and a DBS [Disclosure and Barring Service in respect of criminal convictions] check.
- Your named referees, from whom we collect the following categories of data: name, dates of previous employment, previous job title, other information regarding your previous position with that referee that the referee may choose to supply.

## HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role. We therefore need to process your personal information to decide whether to enter into a contract of employment with you.

Having your CV and potentially a covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role we will take up references and carry out a criminal record and carry out a credit reference check before confirming your appointment.

On appointment we will issue you with a Privacy Notice for employees.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

## HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

We will use your particularly sensitive personal information in the following ways where we need to carry out our legal obligations or exercise rights in connection with employment:

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- We will use information about your disability status, if it provided to us either by yourself or the Agency to consider whether we need to provide appropriate arrangements; and
- We will use information about your age, gender, race or national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting.

## **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled or required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- The role you have applied for requires a high degree of trust and integrity since it involves dealing with high value client money and so we would like to ask you to seek a basic disclosure of your criminal records history.

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

## **AUTOMATED DECISION-MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision making.

## **DATA SHARING**

### **Why might you share my personal information with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application, DBS and Credit Reference checking and external referees. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. 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.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## DATA RETENTION

### How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information 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 information for a fixed period on that basis.

## RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer (Data portability)** of your personal information to another party, which allows us to transfer your data to another party.

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If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the HR Manager in writing.

#### **RIGHT TO WITHDRAW CONSENT**

When you applied for your role, in the limited circumstances where you may have provided consent to us processing your personal information 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 HR. 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.

#### **DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer (DPO) to oversee compliance with this **privacy notice**. If you have any questions about this **privacy notice** or how we handle your personal information, please contact the DPO. Their contact details are [dataprotectionofficer@raphael.co.uk](mailto:dataprotectionofficer@raphael.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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