

RECRUITMENT PRIVACY NOTICE

INTRODUCTION AND PURPOSE

Oxford Policy Management Limited 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 sub-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; and
- kept securely.

WHAT PERSONAL DATA DO WE COLLECT

In connection with your application for work with us, we will collect store and use the following categories of information. This represents the minimal amount of personal data required for us to make a recruitment decision and to contact you about that decision. This information will normally include:

- your name, employment history and academic qualifications, and any other information that you have provided to us in your curriculum vitae and covering letter;
- the information you have provided on our application form, if relevant, including title, address, telephone number, personal email address, date of birth, gender;
- any information you provide to us during an interview; and
- the result of psychometric testing which use as part of our selection process.

We may also collect, store, and use the following types of more sensitive personal information:

- information about your race or ethnicity;
- information about your health, including any medical condition, health and sickness records; and
- information about criminal convictions and offences.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- you, the candidate;
- recruitment agencies, from which we collect data similar to that specified above;
- background check providers from whom we collect details of allegations and or criminal convictions, if any, for fraud, bribery and corruption, money laundering, terrorism financing, and sexual and other criminal behaviour; and
- your named referees

HOW WE WILL USE INFORMATION ABOUT YOU

Only the relevant persons required to fill open positions within OPM have access to your stored data. We will use the personal information we collect about you to:

- assess your skills, qualifications, and suitability for the work;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to work since it would be beneficial to our business to appoint someone to that work.

We also need to process your personal information to decide whether to enter into a contract of employment or services with you.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

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. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

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: our psychometric service provider, background check providers, our client e.g. the Department for International Development (“DFID”) if you are applying to work on a DFID project and IT service providers hosting our recruitment portal. We may also share your information with other entities within our group of companies. We and 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 GDPR and 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. Details of these measures may be obtained from us contacting our Human Resources department.

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?

Whether you have applied directly for an open position, submitted a speculative application or been sourced by us through LinkedIn or other channel, we will retain your personal information for a period of six (6) months after we have communicated to you our decision about whether to appoint you. 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 guidelines.

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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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** of your personal information to another party.

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 our Human Resources Department.

CONCERNS

If you have any questions about this privacy notice or how we handle your personal information or if you have any concerns over the way that we are processing your data, require any further information about your rights set out above or wish to exercise any of your rights, please contact our Head of Compliance & Risk on 01865 207 300.

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.