

Aptitude Software Limited – Candidate Privacy Notice

What is the purpose of this document?

Aptitude Software Limited (“Aptitude”) is a “controller” of personal information about candidates applying for roles with us. 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 (the “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.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, salary history, marital status and qualifications.
- The information you have provided to us for your emergency contacts: their name, address and contact number.
- Any information you provide to us during an interview.
- Any test results.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race, nationality or ethnicity.

- Information about your health, including any medical condition, illness health and sickness records.
- 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.
- A recruitment agency, who have introduced you to us.
- Our background check provider, from which we may collect the following categories of data: academic verification, employment verification
- Your former employers, from which we collect employment data.
- Your former education providers, from which we collect the following categories of data: academic and professional qualifications.
- Disclosure and Barring Service in respect of criminal convictions.
- The following data from third parties is from a publicly accessible source: address verification.

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 work/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 ~~and~~ requirements.

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

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

If you fail to provide personal information

If you fail, when requested, to provide information 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 work/role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We envisage that, for applicable roles, we will process information about criminal convictions. You will be informed if this applies to your role.

In respect of the applicable roles, we will collect information about your criminal convictions history if we would like to offer you the work/role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled 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 at the request of our clients for roles that require a high degree of trust and integrity 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 we share your personal information with third parties?

We will only share your personal information with the following third party for the purposes of processing your application: HireRight. 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. Details of these measures may be obtained from Aptitude HR.

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 six months after we have communicated to you our decision about whether to appoint you to the work/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 applicable laws and regulations.

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 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 in a machine-readable standard format.
- 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 Aptitude HR or the Information Security Officer (on dataprotection-office@aptitudesoftware.com) in writing.

Right to withdraw consent

In the limited circumstances where you may have provided consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that processing at any time. To withdraw your consent, please contact Aptitude HR or the Information Security Officer on dataprotection-office@aptitudesoftware.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes originally agreed to, unless we have another legitimate basis for doing so in law.

Information Security Officer and Data Protection Office

We have appointed an Information Security Officer 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 Data Protection Office, using the contact details below. 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.

If you have any questions about this privacy notice, please contact the Data Protection Office, using the contact details below:

Aptitude Software Limited
Old Change House
128 Queen Victoria Street
London
EC4V 4BJ
Phone: +44 (0)20 7496 8196
Email: dataprotection-office@aptitudesoftware.com