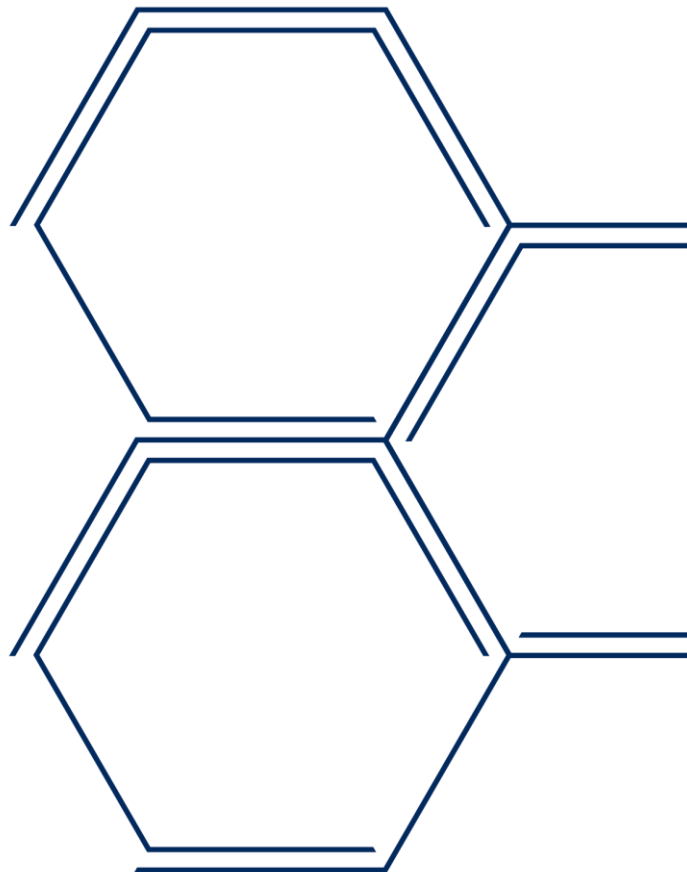




Applicant Privacy Notice

November 2021



Purpose

This document outlines the Company's approach relating to the processing of personal data in manual and electronic records kept by the Company in connection with its job applicants to Benchmark Capital.

Scope

This document applies to all job applicants and UK based Benchmark Capital employees.

Document owner

This document is owned by Vanessa Frampton, HR Director. If you have any queries or comments regarding the information contained in the document, please contact Vanessa.Frampton@BenchmarkCapital.co.uk

Document approval

This document should be reviewed by the document owner every 12 months and significant changes should be approved by the HR Management team and Legal.

Approval and sign off		
Version	Name/Committee	Date
1	Vanessa Frampton	11.07.2019

Version history

Document history and revision information			
Version no.	Description of changes	Written or updated by	Date
1.0	New Policy	Vanessa Frampton	11.07.2019
2.0	Annual Review	HR	03/07/2020
3.0	GDPR amends	HR	15/10/2021

Confidentiality level

This document is intended for use by Benchmark Capital applicants and perspective employees only. This document is the property of Benchmark Capital, and must not be copied or used for any purpose other than for which supplied. It is a controlled document issued by authority of the HR department.

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Section 1 About this document

- 1.1 This privacy notice applies if you are applying for employment at Benchmark Capital or one of its subsidiaries.
- 1.2 Company is aware of its obligations under the General Data Protection Regulation (GDPR), retained in domestic law as the UK GDPR and is committed to processing your data securely and transparently. This privacy notice sets out, in line with UK GDPR, the types of data that we hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

Section 2 Data Controller details

- 2.1 The Company is a data controller, meaning that it determines the processes to be used when using your personal data. Contact details regarding personal data is as follows: Vanessa Frampton, Human Resources Director Vanessa.frampton@benchmarkcapital.co.uk

Section 3 Data protection principles

3.1 In relation to your personal data, we will;

- a) Process it fairly, lawfully and in a clear, transparent way
- b) Collect your data only for reasons that we find proper for the course of your application in ways that have been explained to you
- c) Only use it in the way that we have told you about
- d) Ensure it is correct and up to date
- e) Keep your data for only as long as we need it
- f) Process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

Section 4 Types of data we process

4.1 We hold many types of data about you, including;

- a) Your personal details including your full name, address, date of birth, email address, phone numbers & whether or not you have a disability
- b) Gender, nationality and Civil/Marital status
- c) Information included on your CV including references, education history, qualifications and employment history
- d) Documentation relating to your right to work in the UK

Section 5 How we collect your data

- 5.1 We collect data about you in a variety of ways including the information you include in a CV, recruitment cover letter, or notes made by us during a recruitment interview. Further information will be collected from you directly such as evidence of your right to work in the UK.
- 5.2 In some cases, we will collect data from third parties, such as employment agencies, background check companies, former employers when gathering references or credit reference agencies, Adverse media, Directorship checks and Cifas.
- 5.3 Personal data is kept within the Company's HR and IT systems.

Section 6 Why we process your data

- 6.1 The law on data protection allows us to process your data for a number of lawful basis including:
 - a) the performance of a contract we have with an individual
 - b) In order to carry out legally required duties
 - c) In order for us to carry out our legitimate interests
 - d) To protect your interests; and
 - e) Where something is done in the public interest
- 6.2 All of the processing carried out by us falls into one of the permitted reasons.
- 6.3 Generally, we will rely on the five reasons set out above to process your data. For example, we need to collect your personal data to ensure we are complying with legal requirements such as:
 - a) Carry out the right to work in the UK checks
 - b) Making reasonable adjustments for disabled employees.
- 6.4 We also collect data so that we can carry out activities which are in the legitimate interests of the Company. We have set these out below:
 - a) Making decisions about who to offer initial employment to
 - b) Making decisions about salary and other benefits
 - c) Assess training needs
 - d) Dealing with potential claims against us
 - e) Ensuring our compliance with FCA requirements
- 6.5 If you are unsuccessful in obtaining employment, your data will only be used to provide feedback in relation to the specific application and to seek your consent to retain your data should other suitable job vacancies arise in the Company, which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

- 6.6 If you are successful and you are subsequently offered and accept employment with the Company, the information we collect during the application and recruitment process will become part of your permanent record.

Section 7 Special categories of data

7.1 Special categories of data are data relating to your:

- a) Health
- b) Sex life
- c) Sexual orientation
- d) Race
- e) Ethnic origin
- f) Political opinion
- g) Religion
- h) Trade union membership
- i) Genetic and biometric data

7.2 We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- a) You have given explicit consent to the processing
- b) We must process the data in order to carry out our legal obligations
- c) We must process data for reasons of substantial public interest
- d) You have already made the data public

7.3 We will use your special category data:

- a) For the purposes of equal opportunities monitoring
- b) To determine reasonable adjustments

7.4 We do not need your consent if we use special categories of personal data to carry out our legal obligations or exercise specific rights under employment law.

7.5 However, we may ask you for your consent to process particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time.

Section 8 Criminal conviction data & Cifas Check

- 8.1 We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us.
- 8.2 Upon acceptance of a job offer, the personal information 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 information will also be used to verify your identity. Further details on how your information will be used by us and Cifas, and your data protection rights, can be found in our Employee Privacy Notice which is available to all staff upon joining.

Section 9 If you do not provide your data to us

- 9.1 One of the reasons for processing your data is to allow us to carry out an effective recruitment process. You are under no obligation to provide us with your data, however, we may not be able to process or continue with your application (as appropriate).

Section 10 Sharing your data

- 10.1 Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties. This includes, for example, the HR department, those who are responsible for screening applications and interviewing within the hiring department and the IT department, where you may be required to undertake assessments.
- 10.2 We share your data with third parties to obtain references as part of the recruitment process and to log your application on our recruitment tracking system.
- 10.3 We do not share your data with bodies outside of the European Economic Area.

Section 11 Protecting your data

- 11.1 We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.
- 11.2 Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with UK GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

Section 12 How long we keep your data for

- 12.1 In line with data protection principles, we only keep your data for as long as we need it for and this will depend on if you are successful in obtaining employment with us.
- 12.2 If your application is not successful we will keep your data for 12 months once the recruitment exercise ends. However, you can withdraw your consent to our processing of your data at any time.

Section 13 Automated decision making

- 13.1 No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Section 14 Your rights in relation to your data

- 14.1 The law on data protection gives you certain rights in relation to the data we hold on you. These are:
 - a) The right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
 - b) The right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request to the Human Resources Director via email (Recruitment@benchmarkcapital.co.uk). The email should be clearly titled "subject access request" Please include details of the specific information you require and reasons for requesting the information.
 - c) The right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it.
 - d) The right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it.
 - e) The right to restrict the processing of data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct.
 - f) The right to portability. You may transfer the data we hold on you for your own purposes.
 - g) The right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests.
 - h) The right to regulate any automated decision making and profiling of personal data. You have a right not to be subject to automated decision making in ways that adversely affects your legal rights.

- 14.2 Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

Section 15 Making a complaint

- 15.1 The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

Benchmark Capital Limited is registered with the Information Commissioner's Office under number ZA497302

Section 16 Data protection compliance

- 16.1 James Lasenby is the Company's appointed Compliance Officer in respect of its data protection activities. He can be contacted at james.lasenby@benchmarkcapital.co.uk.