

13. PRIVACY NOTICE FOR EMPLOYMENT APPLICANTS

Riversimple, in accordance with the General Data Protection Regulation (GDPR), are committed to ensuring the lawful, fair and transparent processing of all personal data under its control.

In order to engage you as an employment applicant, it is necessary for us to obtain and process personal data in accordance with the provisions in this privacy notice.

13.1 Who controls and processes your information?

Data Controller: Riversimple Movement Ltd and applicable group companies (Riversimple).

Data Processor: Riversimple.

13.2 The Information we collect:

We collect and process the following personal information:

- Full name;
- Email address;
- Phone number
- Postcode
- Country
- Date of Birth
- Details of your qualifications, skills, experience and employment history, including start and end dates, and current employer (where supplied)
- Salary or salary expectation (where supplied)
- Information about your marital status, next of kin, dependants and emergency contacts; (where supplied)

- Information about your nationality and entitlement to work in the UK;
- Information about your criminal record (where supplied)
- Details of any referees you may have provided
- Information supplied by your referees
- Information about medical or health conditions, including whether or not you have a disability for which the company needs to make reasonable adjustments (where supplied)
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.(where supplied)

13.3 How we collect your information:

We collect information through a number of means, including:

- Email;
- Contact form on our website;
- By post; and
- In person.

13.4 Why we process your information (the Purpose):

(A) To communicate with you about:

- Specific positions you have applied for
- Other positions which may be of interest
- To arrange interviews
- To notify you of outcomes of applications and/ or interviews
- To make an offer of employment (where applicable)

(B) To determine your suitability for employment with Riversimple in the position applied for.

(C) To ensure we meet our obligations under the Immigration, Asylum and Nationality Act 2006 regarding your right to work in the UK.

13.5 The Lawful Basis for which we process your information:

For 13.4 (A & B) the lawful basis is: Processing is necessary for the **legitimate interests** pursued by the Data Controller (Article 6(1)(f) of the General Data Protection Regulation).

It is necessary to process the data collected to ascertain your suitability for employment with in a particular post within Riversimple.

Riversimple complies with the three-part test for reliance on the legitimate interest basis. Namely, that it is legitimate, necessary and balanced against your individual interests, rights and freedoms.

For 13.4 (C) the lawful basis is: **Compliance with a legal obligation** (Article 6(1)(c) of the General Data Protection Regulation).

Riversimple is obliged to process your information in order to comply with the law to which we are subject.

13.6 Who has access to your information:

Your information will be shared internally where appropriate, and in line with 13.8.

We use a number of trusted third parties to provide us with necessary services to run

our business, and who may process your information on our behalf:

- Google - Email and data storage provider;
- Mailchimp - Mailing list processing service provider; and
- We are the Missing Link - Web developer & hosting provider.

13.7 How your information is used:

Your information is only used for the Purpose(s) defined in 13.4, in accordance with the lawful basis detailed in 13.5.

5.8 How we secure your information:

We take appropriate technical and operational measures to ensure that your information is managed carefully and appropriately and to protect against unlawful or unauthorised use and accidental loss or destruction, including:

- Only providing access to those who need access to carry out the Purpose;
- Passwords are protected and, wherever possible, two-factor authentication is employed for extra protection;
- Our file storage provider uses encrypted sessions to protect files as they are uploaded and downloaded; and
- Hard-copy information is stored securely in locked cabinets with access limited to only those who need to have access to carry out the purpose.

13.9 Data Transfers:

(A) Transfers within the European Economic Area:

None.

(B) Transferring of your information outside the European Economic Area:

Information you submit to us is stored on our third party cloud-based data storage and email provider's servers.

Country: United States of America

Safeguard(s) used: our email and cloud-base provider is self certified under the EU-US privacy shield scheme.

13.10 How long we will hold onto your information:

If we do not make an offer of employment, or if an offer of employment is rejected, we will retain your data for six months from the date of notification.

Where an offer of employment is made retention periods will be as defined under the privacy notice pertaining to employees.

13.11 Your rights in relation to your information:

(A) You have the right to **object to the processing** of your information, or to **request that we restrict** how your information is processed. We are obliged to comply with such requests unless there is a legitimate basis for not doing so. Please contact gdpr@riversimple.com to register any objections to or request any restrictions of processing.

(B) Access requests - you may request that we supply all the information we hold about you, at any time. We will endeavour to respond with such information within 30 days. There is no charge for this, except where such requests are clearly unreasonable, in which case a fee of £10 may be charged. We may require proof of ID to ensure such information is not

disclosed to persons other than those to which the information pertains. Please contact gdpr@riversimple.com if you wish to make an access request.

(C) If you feel your information has not been processed in a lawful, fair or transparent manner you have the right to lodge a complaint with the Information Commissioner's Office. Their website can be accessed at www.ico.org.uk and concerns may be reported at <https://ico.org.uk/concerns/>.

13.12 What happens if your information is compromised?

In the event we discover a breach in the way we handled your personal information, we will notify the Information Commissioner's Office within 72 hours of discovery. Where we consider there to be any risk to you as a consequence of the breach we will notify you immediately with details of any resulting risks and measures we have taken or intend to take, and any recommended actions that may help you.

13.13 Sensitive Personal Information:

We do not collect or process sensitive personal information for the purposes of our general mailing list.