



# RECRUITMENT FAIR PROCESSING NOTICE



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## FAIR PROCESSING NOTICE (JOB APPLICANTS AND RECRUITMENT)

The Ardonagh group company that you are applying to is the data controller of your personal data which means we are responsible for deciding how we hold and use personal information about you provided as part of and in connection with your application to work with us and your possible recruitment. You are being sent a copy of this fair processing notice (sometimes called a privacy notice) because you are applying to work with us (whether as an employee, worker or contractor). The privacy and security of your information is important to us. This notice applies to individuals seeking employment or engagement with us. It explains who we are, the types of information we collect, how we use it, who we share it with and how long we keep it. It also informs you of certain rights you have regarding your personal information under current data protection law.

You can find out more about data protection from the Information Commissioner's Officer here: <https://ico.org.uk/>.

## WHO ARE WE?

The relevant part of The Ardonagh Group of companies is the Data Controller of the information you provide us and is registered with the Information Commissioner's Office.

For general data protection queries you can contact us by email to [groupprivacy@ardonagh.com](mailto:groupprivacy@ardonagh.com) or in writing to Group Privacy Office, 6 Bevis Marks London EC3A 7BA, United Kingdom. Please advise us of as much detail as possible to comply with your request. Alternatively, Staff can direct enquiries to their HR team (contact details are set out in staff procedures or on the group intranet).

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## WHAT INFORMATION DO WE COLLECT?

We and other Ardonagh Group companies on our behalf will collect information about you. Information will include your name, telephone number, email address, postal address, date of birth and other details. For example, this may include your employment history, information you provide in your curriculum vitae, confidential references, ID, evidence of right to work, education and qualifications, current and expected remuneration, benefits expectations, interview notes, psychometric test results or companies house checks and background screening checks (depending on role), as well as any other information you choose to provide us with in support of your application (e.g. equal opportunities information, letters of introduction or information provided to us during interview).

Information collated about you as part of your application and recruitment process may be provided by you or, in some cases, by an agent or recruiter you have authorised to do so on your behalf or a background check provider or credit reference agency or the disclosure & barring service re criminal convictions. We may also obtain information from external sources such as referees and publicly available sources.

Sometimes we may need to request and collect particularly sensitive information about you. This might include information in relation to your health or medical records or previous criminal convictions and offences, but certain other information is also deemed to be particularly sensitive. More information can be found on the [ICO website](#). Where we need this information we will obtain your explicit consent unless this is not required by law, or the information is required to protect your health.

You may have already provided explicit consent for this information to be shared with us for the purpose of a job application via a recruitment agency or through someone you have authorised to act on your behalf.

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## HOW WE USE YOUR INFORMATION

We will comply with data protection law and principles. We will keep and process and use the information about you for job application and recruitment purposes. This includes using information about you to enable us to assess or shortlist candidates, comply with any legal requirements, pursue the legitimate interests of The Ardonagh Group and to protect our position in relation to legal proceedings.

For example, we and other Ardonagh Group companies and third parties on our behalf will use your personal information (including sensitive information) to:

- Assess your skills and suitability for the role and process your job application
- Communicate with you or your authorised agent or representative about your application
- Arrange any assessments, meetings or interviews as necessary
- Enable relevant checks and screening to be undertaken to confirm who you say you are, your eligibility to work and that you are a reliable and trustworthy person to undertake the role you have applied for, which may include confidential references
- Enable criminal record checks, where required for the role
- Disclose any information where we are legally obliged to do so
- Retain and use information that is necessary for continued engagement
- Protect and further our legitimate interests as a business
- Detect and prevent fraud or other criminal activity
- We may check information provided to us against publicly available sources for accuracy
- Enable contractual documentation to be prepared and entered into for your role if your application is successful – for example a contract of employment.

### Automated Decision making:

In some cases, we use automated decision making when online assessments are used, this is to eliminate bias. Tests are commonly used may include:

- Verbal reasoning
- Numerical reasoning
- Decisions are made on who to invite to later stages based on automated scoring and sifting processes. In addition, test scores and other applicant data are regularly captured for statistical and research analysis purposes.
- Your score is calculated from the responses you give during the test, and no other information about you is used. We compare your score to those gained by a peer group who previously took the test, to give you a percentile.
- The vacancy will have a minimum percentile requirement, and if your score is lower than this, you will be rejected, and your application will not be considered further.



## SECURING YOUR PERSONAL INFORMATION

We and other Ardonagh Group companies have mandatory security procedures in the storage and disclosure of your personal information, including storage in electronic and paper formats, to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. 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 obliged to do so. We limit access to your personal information to those employees, agents, contractors or other third parties who have a business need to know the same for the purposes of your application/recruitment. If we provide information to a third party we will require it and any of its agents and/or suppliers to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Fair Processing Notice

Any new information you provide us may be used to update an existing record we hold for you.



## WHEN DO WE SHARE YOUR INFORMATION?

We will share information within The Ardonagh Group of companies where it is necessary in connection with your application or recruitment.

We will also share information with third parties where it is necessary in connection with your application or recruitment and who we use to carry out certain processes on our behalf as data processors, for example recruitment services, pre-employment screening and security checks as well as third parties and regulators requiring information such as the Department of Work and Pensions. We require all third-party service providers and group entities to take appropriate security measures to protect your personal information in line with our policies. We will not allow third party service providers to use your personal data for their own purposes and we will only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may be obliged or allowed by law to pass on your information to the police or other law enforcement body or statutory or regulatory authority. We may also share your information with anyone you have authorised to deal with us on your behalf.

The information we collect about you may be transferred to, and stored at, a destination outside of the European Economic Area ("EEA"). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, providing you with information you have requested or providing The Ardonagh Group companies with IT services.

We may also share your data with other companies who carry out market research on our behalf and who may contact you for the purpose of obtaining feedback on the products and services we offer.

## HOW LONG DO WE KEEP YOUR INFORMATION FOR?

We will not keep your personal information longer than is necessary for the purpose for which it was provided unless we are required by law or have other legitimate reasons to keep it for longer, for example if necessary to protect our position in legal proceedings.

We and other Ardonagh Group companies will normally keep information on unsuccessful applications for no more than 12 months after the application has ended. If an applicant is unsuccessful, we may use their information on file for future opportunities and we will use the information to monitor our recruitment processes.

## YOUR RIGHTS (INCLUDING RIGHTS OF ACCESS, CORRECTION AND ERASURE)

There are a number of rights that you have under data protection law. Commonly exercised rights are:

**Access** – you may reasonably request a copy of the personal information we hold about you so you can see what we have and that we are processing it lawfully. [ICO guidance](#). Please note that all references are sought on a confidential basis and are not subject to the right of access.

**Correction** – you may request correction of the personal information we hold about you to enable any incomplete information to be corrected. [ICO guidance](#).

**Erasure** – where we have no legitimate reason to continue to hold your information, you have the right to have your data deleted (sometimes known as the right to be forgotten). [ICO guidance](#).

**Automated Decision making** – You have the right to have the logical of any automated decisions making explained to you and to request a manual (human) review of the decision.

[ICO guidance](#).

There are also other less commonly used rights, which may not apply in all circumstances. Details of these can be found on the [ICO website](#).

## HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us by email to **[groupprivacy@ardonagh.com](mailto:groupprivacy@ardonagh.com)** or in writing to Group Privacy Office, 6 Bevis Marks London EC3A 7BA, United Kingdom. You can also complain to the ICO if you are unhappy with how we have used your data.

**The ICO's address:**

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: **0303 123 1113**

ICO website: [www.ico.org.uk](http://www.ico.org.uk)



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