

Mace CONSULT

Candidate Privacy Notice

What is the purpose of this document?

Mace Consult Ltd is a "controller" in relation to personal data. 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 UK General Data Protection Regulation (**UK GDPR**).

Depending on the role you are applying for, we may also have to comply with relevant local laws, including other data protection law requirements.

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.

We will obtain your consent to process or transfer your data, where required to by law, for example, if we request sensitive or special category data from you.

Who is your personal information collected from?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Via the recruitment platform you have used to submit your details, for example, Phenom.
- From our background screening provider, in the UK we use Security Watchdog which acts on our behalf to collect data from third parties including the Disclosure and Barring Service (DBS) in respect of criminal convictions. We may use other screening providers in other jurisdictions
- We may also collect and process personal data from third parties where this data is from a publicly accessible source, such as LinkedIn or other social media platforms where relevant to your role.

If we collect information about candidates from other sources we will inform them, and where required, obtain their consent, where appropriate.

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, address, telephone number, personal email address, education history, qualifications and employment history.
- Any information you provide to us during the interview process.
- Information you provide to evidence your right to live and work in the respective jurisdiction e.g. your passport or other documents
- Information obtained from sources other than yourself previously referred to in this notice.
- Information we obtain via our screening processes such as confirmation of your identity, your prior employment history etc,

This may involve us collecting, storing and using the following types of more sensitive personal information:

- Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

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.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process
- Communicate with you about suitable job opportunities
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

Please note, Mace Consult appoints people at its sole discretion and to do so, will use the information that you have provided in connection with your application as well as information we obtain during the application process, to decide whether to appoint you to the relevant role.

Please be aware that we may also require further enhanced screening checks to be completed should your role include, at the time, or in the future, sensitive or government programmes, this may include criminal record checks or other such checks which are undertaken to ensure your suitability for the role.

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

Having received your CV, covering letter **or** your application form (as applicable), we will then process that information to decide whether you meet the requirements to be shortlisted for the role.

Where we believe you meet our requirements, we will decide whether your application is strong enough to invite you for an interview. This interview may be in person or via a video or telephone interview.

If we decide to contact you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role.

If we decide to offer you the role, we will then take up references, carry out a criminal record check appropriate to the role you have applied for and may carry out any other necessary checks appropriate to the role before confirming your appointment. When required, we will obtain your consent to carry out these checks.

Data Processors:

Mace Consult and its subsidiaries may use other organisations to provide services to us during our talent acquisition process. These organisations may process your personal data to deliver these services.

Use of AI

In processing your personal data, we use may use AI to assist us in discovering CV's which match our role requirements and may also use the AI to provide a "fit score" against role requirements.

For further information about the AI use via the Phenom platform please visit www.phenom.com/talent-discovery and www.phenom.com/fit-score

Where Mace Consult use this AI, we always ensure that there is a human in the loop making meaningful decisions about your application.

If you fail to provide personal information

If you fail to provide information when requested as part of our pre-employment screening process, (such as evidence of qualifications or work history), we may not be able to progress your application.

How we use particularly sensitive personal information

Where appropriate, and where you agree to provide your sensitive information to us, we will use your particularly sensitive personal information in the following ways:

- We use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting. We usually do this in an anonymised format unless we have your permission to do so in another way.
- We may use your health information where this is needed to accommodate any specific needs you may have during the interview process, where you provide this to us, for example, if you need us to make reasonable adjustments during a test or interview.

Information about criminal convictions

We envisage that where appropriate, we will process information about criminal convictions or seek to have our provider process this information on our behalf.

Depending on the nature of the role you have applied for, we will collect information about your criminal convictions' history, proportionate to the role or potential roles you may undertake and if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). For example, if you are working within a programme or project where the information you may have access to is sensitive, or where you may have access to vulnerable people or other such similar circumstances

Depending on the nature of the role, we are required or 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. Any such checks will be proportionate to the role for which you apply, and may include Mace carrying out the following checks in relation to your criminal conviction history:

- DBS checks (UK);
- Enhanced DBS checks (UK) (as applicable);
- Baseline Personnel Security Standard (BPSS), CV and Security Vetting (SV) checks, where your role provides for access to sensitive/government information;
- International pre-employment checks via Interpol (as applicable to the role you are going to undertake);
- Other additional checks (appropriate to the role you are going to undertake).

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. Please ask us for a copy if you require this.

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 you share my personal information with third parties?

We may share your personal data with suppliers, service providers and partners who work with us to provide administration and support services, or recruitment services. For example, recruitment agencies, firms conducting right to work checks, candidate screening/assessment providers and, if applicable criminal or other background screening providers.

Mace Consult companies, including to those providing administration and support services or for reporting purposes. Government agencies, regulatory bodies and law enforcement agencies where we are obliged to by law. When required, and only to the extent necessary, our professional services advisers, such as tax, legal or accounting advisers; past, potential, or future employers; and in the context of organisational restructuring or acquisition of our business.

We also share your personal information with the following third parties for the purposes of screening our potential employee's where a job offer has been made and these screening requirements form part of your employment contract with us or are required by law.

In the UK and parts of the EEA we use a third-party screening provider called **Security Watchdog**.

Security Watchdog uses your personal information to carry out the following checks if required for the role you have applied for:

- Employment references;
- Right to work in the UK or other applicable jurisdictions;
- Name and address verification;

- Basic DBS check (as applicable);
- Social media check where appropriate; and
- Financial probity check where appropriate and applicable to your role (for example, some finance roles or if we are asking you to work with clients in a regulated industry and they require us to carry out such checks)

Where you apply for a role based elsewhere, other than the UK, we may use a different third-party screening provider. Where we do so, we will advise you of the details pertaining to this in the interview or job offer process.

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.

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 the Mace Privacy Team whose contact details are Privacy@macegroup.com

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 CV for 24 months after we have communicated to you our decision about whether to appoint you to the role unless you ask us to delete it. We retain your personal information for that period so that we can show that we have not discriminated against candidates on prohibited grounds, that we have conducted the recruitment exercise in a fair and transparent way, to match you against other suitable roles and to comply with local laws and regulations.

We may also retain your personal information on file, on the basis that we might be able to consider you for an opportunity that may arise in future. Where we hold this information, your data subject rights are retained.

Rights of access, rectification, erasure, objection, restriction and data portability

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 making 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 rectification** 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 the Mace Privacy Team whose contact details are Privacy@macegroup.com.

Changes to this privacy notice

We may update this Privacy Notice from time-to-time by posting a new version on our websites. You should check this page occasionally to ensure you are happy with any changes. Where changes are material, we may also notify you of them by email.

Questions or complaints

If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact our Privacy Officer who has been appointed to oversee compliance with this privacy notice and whose contact details Privacy@macegroup.com.

If you have any complaints regarding the processing of your personal data, please contact the Mace Consult Privacy team at PrivacyQueries@macegroup.com in the first instance who will respond within 30 days.

If you are in the EU, our EU representative is A&L Goodbody, 25 North Wall Quay, Dublin 1, D01 H104 contactable via email Privacy@macegroup.com

In the event we are unable to answer and resolve your complaint to your satisfaction, and you are based in the UK, please raise a complaint with us in the first instance on Privacy@macegroup.com. We will respond to you in 30 days and will endeavour to assist you with your concerns.

If you or your data is subject to the UK GDPR, you have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**) once you have raised a complaint with us, or if you are subject to a different jurisdiction's privacy laws, the applicable supervisory authority who is responsible for data protection issues in that jurisdiction. In the UK the details can be found at <https://ico.org.uk/make-a-complaint/> or the applicable supervisory authority's website.

Please contact the privacy team Privacy@macegroup.com if you would like a copy of our complaints policy.

For further information please see our general privacy policy here: <https://www.macegroup.com/privacy/mace-consult-privacy-notice/>

