

This notice explains how Crowder & Co Ltd collects, uses, and protects your personal data during the recruitment process in accordance with the UK GDPR and the Data Protection Act 2018.

## Data Controller

Crowder & Co Ltd is the data controller for the purposes of recruitment processing. 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.

## 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.

## Categories of Data

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 or application form and covering letter.
- The notes collated by ourselves as part of any telephone interview that may take place.
- Any information you provide to us during an interview.
- The results of any tests that you undertake as part of the recruitment process.
- We may also collect, store and use the following "special categories" of more sensitive personal information:
  - Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
  - Information about your health, including any medical condition, health and sickness records.
  - Information about criminal convictions and offences.

## Sources of Data

We collect personal data about candidates from the following sources:

- Primarily from you
- Any recruitment agency, from which we may collect data provided by yourself.
- Your named referees
- Background-check providers where lawful.

## Purposes & Lawful Bases

We will use the personal information that we collect about you to:

- Process your applications
- Assess your skills, qualifications and suitability for the role
- Arrange interviews and make hiring decisions
- Carry out background and reference checks where applicable
- To meet legal obligations such as right-to-work checks
- Keep records related to our hiring process

## Recipients

Internal HR and hiring teams; referees; background-check providers; government bodies as required by law.

## International Transfers

We do not routinely transfer candidate data outside the UK. If we do, we will ensure appropriate safeguards are in place and that the following conditions are met:

- The transfer is to a country (or an international organisation) that the UK government / European Commission has determined ensures an adequate level of protection.
- A UK International Data Transfer Agreement (IDTA) or EU Standard Contractual Clauses (including an IDT Addendum where applicable) have been put in place between Crowder & Co and the entity located outside the UK / EEA that does not have Adequacy.
- Binding corporate rules have been implemented, where applicable.
- The transfer is otherwise permitted by the law.

## 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 Human Resources.

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

We will retain your personal information for a period of twelve months after we have communicated to you our decision about whether to appoint you to the 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.

## Your Rights

You may have rights to access, rectification, erasure, restriction, objection, and data portability, subject to legal limits. 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 Human Resources in writing.

### **Contact & Complaints**

If you have any questions about this privacy notice or how we handle your personal information, please contact the HR Team. 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. Their website is [www.ico.org.uk](http://www.ico.org.uk).

### **Updates**

We may update this notice periodically; the latest version will be available from HR.