

## Candidate Privacy Notice

Flagstone Group LTD (Flagstone) has prepared this Candidate Privacy Notice (Notice) to be provided to all prospective candidates considering employment opportunities at Flagstone. We need to process your personal data in order to consider your application for vacant roles and if you are successfully offered employment with Flagstone. The purpose of this notice is to give you information about how Flagstone collects, processes, stores and otherwise uses information about you, and your rights in relation to this information.

Flagstone needs to process your personal data to consider your application for vacant roles and to potentially enter into a contract of employment. There are also statutory requirements and other contractual requirements we are required to comply with in relation to your prospective employment, as well as business and operational needs we must meet. If we are not able to carry out the processing activities we describe in this Notice, we may not be able to consider your application for employment or proceed with a contract of employment. Once employed, please refer to our Employee Privacy Notice to understand how we collect, process and store data of our employees.

### **What categories of personal data does Flagstone collect about me?**

'Personal Data' means any information relating to you. Flagstone collects, processes and uses the following categories and types of personal data which we describe as 'Candidate Data' from the candidate stage through to initial employment:

- Identification data: This can include your name, signature, employee number, photo, citizenship, passport/visa, drivers licence and national insurance number.
- Personal information: Your date and place of birth, emergency contact and gender.
- Contact details: Your home address, telephone number and personal email address.
- Information about your prospective role: This includes your prospective position, job title, working time information, work location, start and end dates, job history, education history and qualifications, performance, grievance and disciplinary records and reasons for leaving.
- Information about your salary and benefits: Your salary, any bonus, salary increases, allowances, benefits, pension plans, tax codes, bank account details, accrued salary information and details of any beneficiaries for benefits.

In addition to the above, Flagstone collects, processes and uses the following special categories of personal information about you which we describe as 'Sensitive Candidate data':

- Criminal records data: As part of our pre-employment screening compliance we will receive results of criminal background checks in relation to you.
- Credit reference data: As part of our pre-employment screening compliance we will receive results of credit reference checks in relation to you.

- Previous employment references: As part of our pre-employment screening compliance we will receive employment references from your previous employer, which may cover the details of your employment with them and any additional information they provide (which may contain performance or absence information).
- Race or ethnicity data: This includes information contained within your passport or other citizenship and right to work documentation, and information that you have voluntarily provided Flagstone for the purpose of equal opportunities and diversity monitoring and initiatives.
- Sexual Orientation data: This includes marital status and information contained within your marriage / civil partnership certificate for the purposes of administering name changes and information that you have voluntarily provided Flagstone for the purpose of equal opportunities and diversity monitoring and initiatives.
- Health and Medical data: Such as information contained within a doctor's certificate/occupational health report for the purposes of assessing fitness for work and any reasonable adjustments which may need to be considered. Information on disability for the purposes of accommodating the workplace and legal obligations.

### **How does Flagstone use this data?**

To help clarify why Flagstone collects and uses this data (processing purposes), we have set out a list of reasons below, including examples of some of the data used:

- Administering our workforce and managing the employment relationship: Including setting up employment contracts, conducting pre-employment checks, managing work activities, tracking working hours, tracking internet, email, and telephone usage. Producing and maintaining organisational charts. Managing and monitoring business travel. Carrying out workforce planning. Capturing holiday requests, accruals and availability.
- Administering and providing compensation: Including payroll, expenses and other applicable incentives which involves the processing of identification data, contact details, information about your job, reward package and organisation data.
- Administering and providing applicable benefits and other work-related allowances: Including setting up with benefit entitlements which involves the processing of identification data, contact details, information about your job, reward package, and organisational data.
- Administering mandatory training which involves the processing of identification data, contact details.
- Providing IT systems and support: To enable you and others to perform their work, to enable our business to operate and to enable us to identify and resolve IT issues and to keep our systems secure.
- Complying with applicable laws, regulatory (including FCA) and employment related requirements, including the administration of these requirements: To enable the processing for income tax, national insurance deductions, health and safety, employment and immigration laws and laws relating to sanctions, which involves the processing of identification data, contact details, information about your job, reward package, performance and disciplinary information, absence information and organisational data.
- Monitoring and ensuring compliance with applicable policies, procedures, and laws. To enable internal investigations, which involve the processing of identification data, contact

data, information about your job, reward package, performance and disciplinary information, absence information and organisational data.

- Communication with you and other Flagstone candidates or employees and third parties: including government officials/ bodies which involves the processing of identification data, contact details, information about your job and organisational data.
- Communication with your designated contacts in case of an emergency: Which may involve the processing of contact details and information about your job.
- Responding to and complying with requests and legal demands from law enforcement agencies and regulators: This maybe within or outside your home country and involves the processing of identification data, contact details, information about your job, reward package, performance, disciplinary data and absence information.
- Complying with corporate financial responsibilities: Including audit requirements (both internal and external) and cost / budgeting analysis and controls which involves the processing of identification data contact details, information about your job, reward package, performance, and disciplinary data and absence information.

#### **Why does Flagstone need to collect, process and use my Candidate Data and Sensitive Candidate Data?**

Both Candidate and Sensitive Candidate Data are needed by Flagstone in order to carry out a variety of activities that are linked to your application and potential employment and Flagstone's compliance with its obligations as a result of employing you and as a business.

We are required to explain to you the legal basis for our collecting, processing and use of your Candidate Data and Sensitive Candidate Data. We have a number of these listed below:

*For Candidate Data our legal basis' are:*

Creation and performance of the contract of employment with you; compliance with legal obligation in particular the area of labour and employments law; social security and protection law, data protection law, tax law, and corporate compliance laws. The legitimate interests of Flagstone, Flagstone affiliates or other third parties (as existing or potential business partners, suppliers, customers, end-customers or governmental bodies and / or courts). Your consent, where that is appropriate, meets the requirements of data protection law and has been separately obtained.

*For Sensitive Candidate Data, our legal basis' are:*

To carry out the obligations and to exercise the specific rights of Flagstone or you in the field of employment and social security and social protection law as permitted. To protect the vital interests of you or another individual where you are physically or legally incapable of giving consent. To establish, exercise or defend a legal claim or whenever courts are acting in their judicial capacity. For the assessment of the working capacity of the employee, as permitted by local data protection law.

When we reference 'legitimate interests' this can include:

- Implementation and operation of organisational structure and information sharing.
- Prevention of fraud, misuse of company IT systems, or money laundering
- Operation of a whistleblowing scheme
- Physical security, IT and network security
- Internal Investigations
- Proposed mergers and acquisitions

When relying on 'legitimate interests' basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data, to ensure that its appropriate for us to rely on legitimate interest and to identify any additional steps we need to take to achieve the right balance.

### **Who might Flagstone share your personal information with?**

Flagstone may transfer personal data to third parties, including outside the EEA for processing purposes as follows:

- Communications with third parties. As necessary in connection with business operations. Work contact details and communication contact details may be transferred to existing or potential business partners, suppliers, customers end-customers or government officials and other third parties.
- Regulators, authorities and other third parties. As necessary for the processing purposes described previously, personal information may be transferred to regulators, courts and other authorities (tax and law enforcement authorities), independent external advisors (e.g. auditors), insurance providers, pensions and benefits providers, internal and external investigations teams.

- **Acquiring entities.** If the business may be sold or transferred in whole or in part (or if a sale transfer is contemplated) your personal data may be transferred to the new employer or potential new employer as part of the transfer itself or as part of an initial review for such transfer (i.e. due diligence) subject to any rights provided by applicable law, including jurisdictions where the new employer or potential new employer are located.
- **Data Processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated to process personal information under appropriate instruction. The Data Processors may carry out instructions related to workforce administration, IT system support, payroll and compensation, training, compliance and other activities. Data Processors will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information and to process personal information only as instructed.

### **Where is my information stored?**

Your Candidate Data and Sensitive Candidate Data is stored within the UK and in some circumstances may be within the European Economic Area or the rest of the world, which may include a country that does not have the same level of data protection as the UK. If the data is located in other countries without adequate protections for personal data, Flagstone will take measures to ensure that your data is adequately protected as required by law.

### **How long will Flagstone keep my information for?**

It is our policy to not keep personal information, including Candidate and Sensitive Candidate data, longer than is necessary. We may, for example, keep your personal information for a reasonable time after you have left to ensure that Flagstone has the records that it needs in the event of a dispute or regulatory investigation and to ensure that any ongoing contractual obligations can be complied with. Our records retention policy states that for job applicants we retain personal data for no more than 6 months after the candidate has been informed they are unsuccessful or have not accepted an offer of employment. Where personal information is kept, that period will be determined by applicable local law. Further information can be found within our Records Retention schedule.

### **What rights do I have in respect of my personal information?**

You have a number of rights in relation to your Candidate and Sensitive Candidate data. There are exceptions and limitations to these rights; however, the rights can be summarised in broad terms as follows:

- **Right of Access**  
You have the right to confirm with us whether your personal data is processed, and if it is to request access to that personal data. This request can include asking for categories of personal data processed, the purpose of processing and recipients. We do have to consider the rights of others, so we may have to limit or restrict the information we provide to you to protect those rights.
- **Right to rectification**  
You may have the right to rectify inaccurate or incomplete data concerning you.

- **Right to Erasure (right to be forgotten)**

you may have the right to ask us to erase personal data concerning you.

- **Right to restriction in processing**

In limited circumstances you have the right to request that we restrict processing of your personal data, however where we process Candidate and Sensitive Candidate data for purposes where we have a legitimate interest in processing, this may override your request.

- **Right to data portability**

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

- **Right to object and rights relating to automated decision making**

Under certain circumstances, you may have the right to object to the processing of your personal data by us.

- **Right to withdraw consent to processing of personal data**

At any time in the process, you have the right to withdraw consent to Flagstone processing personal data.

You also have the right to lodge a complaint with local competent data protection supervisory authority, which in the UK is the Information Commissioner's Office (ICO), and can be contacted:

Information Commissioner's Office  
Wycliffe House Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)  
Telephone: 0303 123 1113

### **Who can I contact about this Privacy Notice?**

If you have questions or concerns about this Notice, or if you would like to exercise your rights you can contact:

Data Protection Officer  
Flagstone Group LTD  
Floor 1, Clareville House  
26 -27 Oxendon Street, SW1Y 4EL