



Candidate Privacy Policy

1. Introduction

Kepler Interactive Limited (“Kepler”, “we”, “our”, and “us”) is committed to ensuring that your privacy is protected. We are 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). This privacy policy explains how we process personal data concerning candidates who apply for roles (whether as employees, workers or contractors) with Kepler (“you”, “your”, “candidates”).

This policy sets out what personal data we collect, why we collect it, how we use it and the legal basis for doing so and the procedures we have in place to protect your personal data. It is important to read this policy, together with any other privacy policy we may provide in specific circumstances when we are processing your personal data, so that you are aware of how and why we are using your information.

This policy does not form part of any contract of employment or other contract for services and may be amended from time to time in accordance with section **Error! Reference source not found.**

2. About us

We are Kepler Interactive Limited (a limited liability company registered in England and Wales under number 12545265 with its registered office at 7 Savoy Court, London, WC2R 0EX, United Kingdom).

Kepler is a data controller of the personal data it processes in relation to candidates. This means that we are responsible for deciding how we hold and use personal data about you.

We are registered with the Information Commissioner’s Office (“ICO”) under registration number ZB086850.

Questions about your personal information:

If you have any questions about this privacy policy or your information, or to exercise any of your rights as described in this policy or under applicable data protection laws, you can contact us at:

7 Savoy Court, London, WC2R 0EX

By email: legal@kepler-interactive.com

3. Data protection principles

Anyone processing personal data must comply with the principles of processing personal data. We set out these principles below along with our procedures for complying with such principles:

- **Lawfulness, fairness and transparency:** data must be processed lawfully, fairly and in a transparent manner.
- **Purpose limitation:** data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data minimisation:** data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** data must be accurate and, where necessary, kept up to date.
- **Storage limitation:** data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and confidentiality:** data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

4. What information we collect

We collect personal data from our candidates to assist with our recruitment processes and to monitor recruitment statistics.

We set out below a list of the categories of information about candidates that we may collect, store and use. We aim to make this list as comprehensive as possible but it is not exhaustive. The information that we may collect includes, but is not limited to, the following:

- personal contact details such as name, title, home address, telephone number and email address;
- date of birth;
- gender;
- photograph;
- copies of passport, driving licence and similar documents;
- education history, training and professional experience;
- current and past employment details;
- immigration status and work permits;
- languages spoken and level of proficiency;
- other information given in your CV, covering letter and application;
- right to work documentation;

- references;
- data from building access controls including images from CCTV operating in and around our offices; and
- any other information you provide to us during an interview.

5. Information provided by third parties

Some of the personal information we collect (as described in section 4), and additional information, may be provided to us by third parties, including:

- recruitment agencies with whom you have registered an interest. Such recruitment agencies support our recruitment processes under a duty of confidentiality;
- during the recruitment process we may also research information regarding your skills, experience or qualifications and comments and opinions made public on social networking sites such as LinkedIn, Facebook and Twitter;
- we may also receive other information about you from organisations such as credit reference agencies, fraud prevention agencies and referees.

6. Special Categories of Personal Data

You may also supply us with, or we may receive, sensitive personal data relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning your health or data concerning your sexual orientation.

We will use this information for the purposes of either performing our contractual obligations or exercising obligations or rights which are imposed or conferred on us by law in connection with our obligations as an employer including:

- monitoring of equality of opportunity or treatment;
- considering whether adjustments may need to be made to accommodate candidates with a disability;
- reporting and maintaining a record of any accidents at work.

We may also process data which has been made public by you or with your explicit consent

7. Data relating to criminal convictions and offences

We may also collect, store and otherwise process personal data relating to criminal convictions and offences (including the alleged commission of offences).

This data is only processed where it is necessary for the purposes of:

- the prevention or detection of an unlawful act;
- or in connection with, any legal proceedings (including prospective legal proceedings);

- obtaining legal advice; or
- establishing, exercising or defending legal rights.

8. What we do with your information

The information about you which is obtained by us during the application process and during the course of your employment or contract for services (whether obtained directly from you or from third parties) may be used by us for the following purposes:

- to consider your application and your suitability for employment or consultancy services;
- to take up your references;
- to conduct appropriate background checks;
- to negotiate and communicate with you in relation to your application;
- to manage and operate our business and our employees, workers and contractors (“Staff”) and for administrative purposes;
- to undertake business analysis activities;
- to confer benefits in connection with your employment or contract for services;
- to comply with our legal and regulatory obligations and for other legal purposes.

Your information will not be used for other purposes without your permission, save as required by applicable law.

9. The legal basis for our processing

The legal basis for our processing of your personal information is based on the fact that you are a candidate or prospective Staff and it is necessary for us to process your information as follows:

Purposes for which we will process the information	Legal Basis for the processing
<ul style="list-style-type: none"> • To consider your application and your suitability for employment or consultancy services. 	<ul style="list-style-type: none"> • It is in our legitimate interests to recruit Staff and to select the best candidates. We consider this to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
<ul style="list-style-type: none"> • To take up your references and carry out appropriate background checks. 	<ul style="list-style-type: none"> • It is in our legitimate interests to assess the suitability of candidates and Staff. We consider this to be proportionate and will not be detrimental to you.
<ul style="list-style-type: none"> • To negotiate and communicate with you in relation to your application. 	<ul style="list-style-type: none"> • It is in our legitimate interests to recruit Staff and to communicate the outcome of each stage of the recruitment process to

	you. We consider this to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
<ul style="list-style-type: none"> To manage and operate our business and our Staff and for administrative purposes. 	<ul style="list-style-type: none"> It is necessary to comply with our legal obligations as an employer. In addition, it is necessary to comply with our contractual obligations to consultants.
<ul style="list-style-type: none"> To undertake business analysis activities. 	<ul style="list-style-type: none"> It is in our legitimate interests to manage and monitor our Human Resources function. We consider this to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
<ul style="list-style-type: none"> To confer benefits in connection with your employment or contract for services. 	<ul style="list-style-type: none"> It is necessary to comply with our legal obligations as an employer. It is also in our legitimate interests to ensure all current and future Staff have access to a competitive range of benefits.
<ul style="list-style-type: none"> To comply with our legal and regulatory obligations and for other legal purposes. 	<ul style="list-style-type: none"> It is necessary to comply with our legal and statutory obligations as an employer and service provider.

The legal basis for our processing of any special categories of personal data is based on the fact that you are a candidate and it is necessary for us to process such information to comply with our legal obligations, namely:

- for carrying out our obligations as an employer; and
- where relevant in relation to health data, for the assessment of the working capacity of Staff.

We may also process special categories of personal data where necessary for the establishment, exercise or defence of legal claims.

10. Sharing your information with third parties

For the purposes set out in section **Error! Reference source not found.** above, we may share information concerning candidates with other authorised Staff, with our direct and indirect subsidiaries (together with Kepler, the “**Group**”) and their employees, workers and contractors or with our third party service providers such as recruitment agencies and background checking agencies. All our third-party service providers and our Group members are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will also disclose personal information concerning candidates to other third parties where there is a legitimate reason to do so including in the event that we sell or buy any business or assets, in

which case we may disclose your personal information to the prospective buyer or seller of such business or assets.

We will also disclose your personal information to the extent we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

11. Accuracy of data

We will take reasonable steps to try to ensure that your information is kept accurate and up-to-date. However, all candidates are requested to ensure that Kepler is notified of any changes to their personal information without undue delay.

Where you have notified Kepler or we otherwise become aware of an inaccuracy in your personal information, we will take every reasonable step to sure that the information is either erased or rectified without delay.

12. Your rights

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you (“**subject access request**”);
- to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on our legitimate interests. In such an event we shall no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests or for the establishment, exercise or defence of legal claims;
- to object to us sending you marketing communications (if applicable);
- to require us to erase your personal data (the “**right to be forgotten**”);
- to require us to restrict our data processing activities;
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller (“**data portability**”); and
- to require us to correct the personal data we hold about you if it is incorrect, or to complete any data which is incomplete including by means of providing a supplementary statement (the “**right to rectification**”).

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

13. Exercising your rights

If you wish to exercise any of the rights set out above, please contact us and specify which right(s) you wish to exercise.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

15. International transfers

Your personal data may be transferred to, stored, and processed in a country other than the one in which it was collected. It may also be processed by staff operating outside the UK and the European Economic Area (“EEA”) who work for Kepler Interactive Limited, other legal entities owned by Kepler Interactive Limited or for our or their third-party service providers. In such cases, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; and/or
- we may use specific contracts approved for use in the UK and the EEA which give personal data the same protection it has in the UK and the EEA.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or the EEA.

16. How long we keep your information

If your application is successful and you subsequently become employed by us, the information will become part of your personnel file in accordance with our Employee Privacy Policy that will be provided with our employment contract.

Personal data about unsuccessful candidates will be held for 5 years after the recruitment exercise has been concluded. 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. It will then be

destroyed or deleted. We may retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

17. Complaints

If you have concerns about our use of your personal data, please send an email with the details of your complaint.

You also have the right to complain to the ICO (<https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

18. Changes to this privacy policy and your duty to inform us of changes

We keep this candidate privacy policy under regular review. This version was last updated on 8 April 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.