



LIGHTHOUSEGROUP

EMPLOYEE CANDIDATE PRIVACY STATEMENT

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This statement outlines our Privacy Statement and the way Lighthouse Group plc treats your data in line with General Data Protection Regulation (GDPR). Any reference to Lighthouse Group plc includes the company and all associated group companies.

This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

If you have any questions about the statement or your rights under GDPR, please contact: Julia Newman, Head of Group HR Julia.newman@lighthousegroup.plc.uk.

About Lighthouse Group plc

As your potential employer, Lighthouse Group plc ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant Data Protection Regulation and laws.

Lighthouse Group plc's registered office is at 26 Throgmorton Street, London EC2N 2AN and we are a company registered in England and Wales under company number 04042743.

We are registered on the Information Commissioner's Office Register; registration number Z1260688.

How Lighthouse Group uses your personal information

Lighthouse Group plc processes your personal information to meet our legal, statutory and contractual obligations in relation to your employment and any wider data use.

We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

Your information will be held by Lighthouse Group plc as Data Controller.

Should you be successful in your application, you will be provided with a further Privacy Notice for Employees which will detail how your data will be processed when your employment starts.

How we use your personal information

This privacy notice is to let you know how Lighthouse Group plc promise to look after your personal information. This includes what you tell us about yourself and what we learn by you applying for employment with Lighthouse Group plc. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

How the law protects you

As well as our Privacy Statement, your privacy is protected by law. This section explains how that works. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Lighthouse Group plc.

In order to use your personal data, the law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. Even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

What data do we collect?

The tables below shows the data we collect and the reasons for the use of that data including any legitimate interests.

Data	Legal Basis – Contract and Legal Obligation
<p>Full name (if not common), home address, email address and gender.</p> <p>Date of birth, National Insurance Number, Passport Number, Visa Permit number, photos, handwriting (from application forms) and birthplace.</p> <p>Details of any disability that may require adjustment during the recruitment process.</p>	<p>To meet our contractual and legal obligations to:</p> <p>Fulfil a potential contract of employment should an offer of employment be made;</p> <p>Meet HMRC requirements for employing people;</p> <p>Conduct Right to Work in the UK;</p> <p>Meet the requirements of Employment Law in relation to health, well-being and reasonable adjustments;</p> <p>Meet our obligations under Health & Safety legislation;</p>

As explained above, a legitimate interest is when we have a business or commercial reason to use your information. Even then, it must not unfairly go against what is right and best for you. We are relying on our legitimate interest to process the data shown below:

Data	Legal Basis – Legitimate Interest
<p>Education & Employment History, Qualifications and Grades, previous Job Positions and job titles, work details, previous employment history and previous salary levels.</p>	<p>To fulfil a Legitimate Interest:</p> <p>To allow us to assess your suitability for the role you have applied for and to consider development needs.</p>
<p>Usernames and Login details for Assessment Software and Psychometric Profiling i.e. Competent Adviser and McQuaig Online.</p>	<p>To fulfil a Legitimate Interest:</p> <p>To allow you access to recruitment related assessment systems to assess your competence and suitability for the role for which you have applied.</p>

Legitimate Interests

As noted in the above table, we process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment to ensure that we have

weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

Sensitive (Special) Data.

There are additional provisions relating to the processing of ‘sensitive personal data’. Sensitive personal data will not be disclosed to a third party without your explicit consent. We will only collect and use the following types of data if the law allows us to do so and we have your consent to do so:

- Health information
- Criminal convictions and offences

The sensitive and special data we process is as follows:

Data	Legal Basis – Legal Obligation
Health information: any health information you choose to disclose to allow us to make adjustments to our recruitment processes.	<p>Legal Obligation:</p> <p>Meet the requirements of Employment Law in relation to health, well-being and reasonable adjustments.</p>
Criminal convictions and offences (only applies to FCA Regulated employee candidates).	<p>Legal Obligation:</p> <p>To meet our obligations to the Financial Conduct Authority for Fitness and Propriety of Approved Persons.</p>

Health Information

To meet our legal obligations under Employment Law and Health & Safety requirements, we process your health information from the following sources:

- Details of any disability to allow us to make reasonable adjustments during the recruitment process.

Access to your health information is restricted to the recruiting manager and HR only. Your health information will not be shared with others without your explicit consent.

Criminal Convictions and Offences

(Only applies to FCA Regulated employees)

We may need to conduct Disclosure and Barring Service Checks as part of the screening for employment and under the FCA FIT rules for regulated individuals. This only applies to FCA Regulated functions and your explicit consent will be sought if a check is required. The check will be conducted by an external and Disclosure & Barring Service Umbrella Body and the results will be processed in line with the strict criteria applied to this type of data, with access restricted to HR only with the use limited to FCA FIT requirements. Any data held in relation to convictions will be deleted in line with the Retention Policy (How long will we keep your data?).

Consent for Special Categories Data

Owing to the products, services or treatments that we offer, **Lighthouse Group plc** sometimes needs to process sensitive personal information (*known as special category data*) about you.

Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a signed consent form. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

Data we do not collect

We do not collect or use the following types of data on you as our employee:

- Marital status
- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Genetic and bio-metric data

Should Lighthouse Group plc seek to evaluate the above data on employee candidate diversity, this will be achieved through an anonymous survey with the data only accessed by HR.

How we collect your data

Prior to employment: We collect information from your CV provided when you applied for employment.

At the start of employment: Should you be successful in your application, the data will be collected via the acceptance form and accompanying employment documentation required for the contract of employment, Right to Work in the UK check, payment of your salary and employment referencing.

During your employment: Should you be successful in your application, we will collect data throughout your employment on your role and duties, conduct, performance, development, changes in personal contact details, employee benefit and pension details, health information, absences, holiday records and parental and dependents leave information. We also collect data on grievance and disciplinary processes.

With whom do we share your data

Personal information held by ourselves may be disclosed to third parties on a confidential basis, and in accordance with relevant data protection law. We may share your data with the following third parties:

Third Parties

- Psychometric Assessment providers i.e. McQuaig (as part of recruitment processes only);
- HR Management Software provider: to manage the recruitment process.
- Assessment and Training Delivery Software providers i.e. Competent Adviser: to deliver recruitment assessment;
- Legal Advisers: for employment law guidance, if needed;
- Your previous employers for referencing purposes: for employment screening purposes;
- Our Regulator: The Financial Conduct Authority (Regulated roles only) – under our statutory and legal obligations to our Regulator;
- Government organisations as required by law.

We may also share your personal information if the make-up of Lighthouse Group Plc changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets or we may seek to acquire other businesses or merge with them;
- During any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private;
- If a change to our Group happens, then other parties may use your data in the same way as set out in this notice.

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we may wish to have with you. If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot fulfil our obligations to you as your potential employer.

Any data collection that is optional and where your informed consent is needed will be made clear at the point of collection.

Record keeping

We keep records of all your employment application information. You, or your appointed agent, have the right to inspect the records at a mutually convenient time.

As we treat all our employee recruitment records as confidential, we reserve the right to not give you copies of your records where in certain circumstances releasing the original would compromise other employees' confidentiality.

How long will we keep your data?

We will keep your data for only (a) as long as necessary and (b) in line with all legislation and the Employee Retention Policy; normally this is for a period of up to twelve months if you apply for a role and are not successful. If you apply for a role, are successful and accept employment, your data will normally be retained for six years after you leave our employment but may be retained longer if you are in a FCA Regulated role giving advice to clients.

Your Rights

You have the right to access any personal information that Lighthouse Group plc, as your employer processes about you and to request information about: -

- What personal data we hold about you;
- The purposes of the processing;
- The categories of personal data concerned;
- The recipients to whom the personal data has/will be disclosed;
- How long we intend to store your personal data for;
- If we did not collect the data directly from you, information about the source.

Incomplete or Inaccurate Data: If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

Erasure of your Data: You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us.

Data Portability: Where applicable, you have the right to data portability of your information. This means we provide you with your data in a format that can be transferred to another Data Controller.

Automated Decision Making: You have the right to be informed about any automated decision-making we may use. We do not use any automated decision making.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Your right to a copy of your personal information: Under current data protection law you have a right to get a copy of the personal information that we hold about you.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'. There may be legal or other official reasons why we need to keep or use your data. However, please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate;
- It has been used unlawfully but you do not want us to delete it;
- It is not relevant any more, but you want us to keep it for use in legal claims;
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to continue using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us.

How to withdraw your consent

You have the right at any time to contact us to withdraw your consent to collecting future personal data or us holding existing data but this will impact on our ability to fulfil our contractual and legal obligations to you. The consequences of your withdrawal of consent would be provided to you at that time.

Please be aware that under Employment Law, HMRC and FCA regulatory guidance, we are required to hold records in respect of employment, PAYE, advice and guidance for a statutory period.

IT Safeguarding Measures

Lighthouse Group plc employs a holistic security strategy to protect your data from inadvertent or deliberate data loss. This includes, but is not limited to: Centralised Internet Security, Local security, endpoint encryption, email secure messaging, security of applications and Security information and events management. Full details of the IT security measures are available on request.

Transfers outside the EU (if applicable)

Third parties may provide services from centres in countries outside the European Economic Area (the "EEA") (such as India and the USA) that do not always have the same standard of data protection laws as the UK. However, they are required to put a contract in place that ensures that your information is adequately protected, and they will remain bound by their obligations under the relevant data protection law even when your personal information is processed outside the EEA.

If we do transfer information to a Third Party outside the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We will use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA;
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA;
- For data sent to the USA, transfer it only to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU. It makes sure those standards are similar to what is used within the EEA.

Contact details

Should you have any questions regarding this Privacy Statement or your rights under the **General Data Protection Regulation**, please contact:

Julia Newman, Head of Group HR
Lighthouse Group plc
3rd Floor Highbank House
Exchange Street
Stockport
SK3 0ET
Email: Julia.newman@lighthousegroup.plc.uk
Telephone: 0161 285 4257

How to complain

Please let us know if you are unhappy with how we have used your personal information. Please refer to the Lighthouse Group plc contact details above.

You also have the right to complain to the Information Commissioner's Office. Find out how on their website <https://ico.org.uk/concerns/> or call their helpline on 0303 123 1113.