

Privacy notice for job applicants

1. SPV Insights Limited, trading as eXcentius (“we”, “us”, “our”) is committed to protecting your privacy and complying with our data protection obligations under the Data Protection Act 2018 (the **DPA 2018**), the UK General Data Protection Regulation 2016/679 (the **UK GDPR**) and any other applicable UK legislation (together, **Data Protection Law**).
2. This privacy notice describes the categories of personal data we collect from and about you during our recruitment process and how we will use it. Personal data is any information about an identifiable person (e.g. CV or application form, interview or selection notes, references, DBS checks etc).
3. We act as a data controller of your personal data, which means we are responsible for deciding how to hold and use your personal data. Paul Oliver is our data protection officer. If you have any concerns regarding this policy, contact our data protection officer by email at d.p.o@excentius.com.
4. We process your personal data in accordance with the following data protection principles:
 - a) all personal data must be processed lawfully, fairly and in a transparent way;
 - b) personal data must be collected for specified, explicit and legitimate purposes, and any processing must be compatible with the original purposes for which we collected it;
 - c) all personal data must be adequate, relevant and limited to what is necessary to achieve the purpose for which it is processed;
 - d) all personal data must be accurate and kept up to date where necessary, and all reasonable steps must be taken to correct or erase inaccurate data promptly;
 - e) personal data must not be kept in a form which identifies individuals for any longer than is necessary for the purposes of processing; and
 - f) personal data must be processed securely and in a way that protects against unauthorised or unlawful processing, accidental loss, destruction or damage.
5. We will only process your personal data when there is a lawful basis for doing so. In general, the basis will be our legitimate interests in using your data as part of our recruitment process (unless those interests are overridden by your fundamental rights and freedoms).
6. We will not use your personal data for marketing purposes.
7. Any request for consent to the processing of information about you will be made directly to you and will include information about why we are asking for the information and what will be done with it. It is not a condition or requirement of our recruitment process for you to agree to any such consent request from us. Any consent given by you to the optional processing of your personal data can be withdrawn at any time.
8. When we ask for information about you, we will make it clear whether the information requested: (i) must be supplied, whether to comply with a relevant legal obligation or pursuant to our legitimate interests; or (ii) is optional; and the consequences of not providing the information.

Sharing your personal data

9. We will only share your personal data in accordance with Data Protection Law. We may share such personal data where necessary, with employees, contractors, consultants or advisers, where the sharing of your personal data is necessary for the purposes of our recruitment process.

10. Your personal data will only be kept for as long as necessary for the purposes it is being processed and, more specifically, for the periods set out in the table below.

Your rights over your own personal data

11. Depending on the reason your personal data is being processed, you have a right to:
 - a) request access to it;
 - b) ask for personal data that is inaccurate or incomplete to be corrected or completed;
 - c) ask for personal data to be deleted, which we will do when required to by Data Protection Law;
 - d) ask for the processing of your personal data to be restricted, which we will do when required to by Data Protection Law;
 - e) ask for a copy of your personal data in a suitable format or ask for us to transfer it directly to someone else;
 - f) object to us carrying out certain types of processing (see below); and
 - g) if we have asked for consent to process your personal data, to withdraw this consent.

To exercise any of these rights, please contact Paul Oliver at d.p.o@excentius.com. If a concern is not resolved satisfactorily, you can make a complaint to the Information Commissioner's Office (ICO) at www.ico.org.uk.

The right to object

12. You have the right to object to the processing of your personal data which is carried out:
 - a) for direct marketing purposes;
 - b) in the public interest; or
 - c) pursuant to our legitimate interests.

We will stop any such processing that you object to when required by Data Protection Law.

The table overleaf sets out the categories of your personal data that we process, the purposes of that processing, the basis for processing and the retention period for the data.

13. Data categories, purpose and basis of collection

Category of personal data	Purpose of processing	Lawful basis for processing	Retention period
<ul style="list-style-type: none"> Contact details including name, phone number, email address and home address 	To communicate with job applicants and further our recruitment process	Legitimate interest in furthering our recruitment process	Throughout the recruitment process, and up to three months after the end of the process for anyone not taken on. For applicants who join us, information will be retained in accordance with our staff privacy policy (available on request).
<ul style="list-style-type: none"> Educational and training information 	Used to make sure staff have the qualifications necessary for their role and assess suitability for the job	Legitimate interest in ensuring staff are appropriately qualified to fulfil their role and furthering our recruitment process	Throughout the recruitment process, and up to three months after the end of the process for anyone not taken on. For applicants who join us, information will be retained in accordance with our staff privacy policy (available on request).
<ul style="list-style-type: none"> Other information provided on CV/application form/cover letter or in interviews or other assessment exercises as part of the job application Notes made for internal use during assessment and selection process References 	Used to assess suitability for the job and further our recruitment process	Legitimate interest in furthering our recruitment process	Throughout the recruitment process, and up to three months after the end of the process. For applicants who join us, information will be retained in accordance with our staff privacy policy (available on request).
<ul style="list-style-type: none"> Copy of passport and/or driving licence 	To ensure that the applicant has the right to work in the United Kingdom.	Legitimate interest in furthering our recruitment process Compliance with a legal obligation	Throughout the recruitment process, and up to three months after the end of the process for anyone not taken on. For applicants who join us, information will be retained in accordance with our staff privacy policy (available on request).
<ul style="list-style-type: none"> Information and documents concerning immigration status, right to work and residence status 	Used to ensure job applicants have the right to work in the UK	Compliance with a legal obligation Legitimate interest in furthering our recruitment process	Throughout the recruitment process, and up to three months after the end of the process for anyone not taken on. For applicants who join us, information will be retained in accordance with our staff privacy policy (available on request).
<ul style="list-style-type: none"> Information about you available on LinkedIn 	Used to assess suitability for the job and further our recruitment process	Legitimate interest in furthering our recruitment process	Throughout the recruitment process, and up to three months after the end of the process for anyone not taken on. For applicants who join us, information will be retained in accordance with our staff privacy policy (available on request).