Bibby Financial Services Limited and subsidiary companies

Data protection privacy notice (employees, recruitment candidates, and contractors and agency workers)

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends, during the recruitment process and during your engagement with us as a contractor or agency worker. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you. This notice does not form part of any contract of employment or other contract to provide services.

Who collects the information

Bibby Financial Services Limited ('Company') is a 'data controller' and gathers and uses certain information about you. This information is also used by our affiliated entities and subsidiary companies (our 'subsidiary companies'), a full list of which will be provided to you, upon request and so, in this notice, references to 'we' or 'us' mean the Company and our group companies. You can contact us at Bibby Financial Services Limited, Pembroke House, Banbury Business Park, Aynho Road, Adderbury OX17 3NS.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy a co or will be provided to you, on request.

About the information we collect and hold

The tables set out in the Schedule below summarise the information we collect and hold, how and why we do so, how we use it and with whom it may be shared. The table in Part A relates to employees, Part B relates to recruitment candidates (up to and including the shortlisting stage of the recruitment process), Part C summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional and Part D relates to contractors and agency workers.

In addition to the information contained within the Schedule, we may also need to share some of the categories of personal information set out in the Schedule with other parties, such as third parties approved by you, external contractors, suppliers, consultants, third party agencies, service providers (including payroll providers, pension administrators, benefits providers and administration and IT services providers) representatives and agents, our professional advisers, potential purchasers of some or all of our business or on a re-structuring, other companies within the wider Bibby group (for the purpose of providing a service to you). Where practical, information will be anonymised. If practical these recipients of the information will be bound by confidentiality obligations. We may also be required to share some personal information with the Government or any industry regulators (where we are required to do so by law or to assist with their investigations or initiatives), such as the Financial Conduct Authority, HMRC, the Home Office, the Information Commissioners Office or the courts, or with the police, law enforcement or security services (to assist with the investigation and prevention of crime and the protection of national security).

We seek to ensure that our information collection and processing is always proportionate. We will update this privacy notice if there are any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above. Information may be transferred internationally to our overseas businesses and other countries around the world, including countries that do not have data protection laws equivalent to those in the UK. We have security measures in place to seek to ensure that there is appropriate security for information we hold (including those measures detailed in our Global Data Protection Policy (a copy of which is located in the Policy Portal which can be accessed from our intranet and can be provided to you on request)) and any information which is held by third parties who process personal information on our behalf.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process, your employment and your engagement with us for no longer than is necessary for the purposes for which the personal information is processed.

With regard to information obtained during the recruitment process, how long we keep your information will depend on whether your application is successful and you become employed by us. We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. You will be able to access our Data Protection Privacy Notice during the on-boarding process and then on our company intranet.

In most cases, if you become an employee, we will retain your information for no longer than 6 years following the termination of your employment.

Further details on this are available in our Data Retention Policy (a copy of which is located in our Policy Portal which can be accessed from the company intranet).

Your rights

Please contact our Data Protection Officer by email to DPO.UK@bibbyfinancialservices.com and by post to The Data Protection Officer, c/o Bibby Financial Services Limited, Pembroke House, Banbury Business Park, Aynho Road, Adderbury OX17 3NS if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you, restrict the processing of your personal information, transfer your personal information or withdraw any consent which you have given or if you have any questions about this notice or would like to make a complaint about the handling of your personal data. You also have the right to ask our Data Protection Officer for the information we hold and process to be erased in certain circumstances. Please note that not all of these rights may apply in all circumstances and so they may not apply to all your personal information that we hold.

In some situations you have the right not to be subject to automatic decision making. Some of the questions within our recruitment application form are disqualifying questions with the result that, if you answer yes to those questions, you will not qualify for the post which you are applying for. If this happens in circumstances where you still wish to be considered for that role, you may contact our HR department and we will ensure that your application is reviewed by a member of the team and any decision about your application is explained to you.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, you can contact the Information Commissioner at https://ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Part A – Employee information

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers)	From you/from a recruitment consultant	To enter into/perform the employment contract Legitimate interest: to maintain employment records and good employment practice	To enter into/perform the employment contract Information may be shared with our payroll administrator; benefits providers, HM Revenue and Customs (HMRC) and consultants we may engage including our professional advisors
Details of salary and benefits, bank/building society, National Insurance and tax information, your age and gender □	From you/from HMRC	To perform the employment contract including payment of salary and benefits Legitimate interests: to maintain employment records and good employment practice and to comply with legal, regulatory and corporate governance obligations.	To ensure you receive the correct pay and benefits Information may be shared with our payroll administrator, benefits providers (including insurers and pensions providers), professional advisers and with HMRC.
Details of your spouse/partner and any dependants** 🗆	From you	To perform the employment contract including employment-related benefits, e.g. private medical insurance, life assurance and pension Legitimate interests: to maintain records and good employment practice.	To ensure you receive the correct pay and benefits Information may be shared with our payroll administrator, benefits providers and professional advisers
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office, identity checking agencies and professional advisors

A copy of your driving licence and information from it Details of your pension arrangements, and all information included in these and necessary to implement and administer them	From you, from our pension administrators, Standard Life, and from your own pension fund administrators	To perform the employment contract To comply with our legal obligations Legitimate interest to comply with the terms of our insurance To perform the employment contract including employment-related benefits To comply with our legal obligations to comply with legal, regulatory and corporate governance obligations Legitimate interests: to maintain employment records and good employment practice	To ensure that you have a clean driving licence Information may be shared with our insurer and our driving compliance provider, professional advisers and law enforcement authorities To administer your pension benefits and to comply with our auto-enrolment pension obligations Information may be shared with our payroll administrator, our pension administrators, our life assurance providers, professional advisors and with HMRC
Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health)	From you, from your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators	To perform the employment contract including employment-related benefits To comply with our legal obligations and to comply with legal, regulatory and corporate governance obligations Legitimate interests: to maintain employment records and good employment practice, to ensure safe working practices. For any other purpose which you have given your consent to.	To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits To comply with our legal obligations to you as your employer Information shared with your doctors, with medical and occupational health professionals we engage and consultants we. may engage. For further information, see * below
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment) For any other purpose which you have given your consent to.	To comply with our equal opportunities monitoring obligations and to follow our policies For further information, see * below
Your photograph	From you	Legitimate interests: to ensure a safe working environment by helping us	Your photograph is likely to be displayed at the foot of all emails which are sent to or

		and your colleagues to identify you, to help foster a collegiate and sociable working environment and to support marketing initiatives	from you and other systems used by Bibby Financial Services Limited (including the People Portal) – you are in control of maintaining this data and can remove it if you wish From time to time we may feature you in internal news stories and marketing initiatives on the Hub and on external marketing initiatives (including newsletters, brochures and our website)
Criminal records information, including the results of Disclosure and Barring Service (DBS) checks 🗆	From you and the DBS	To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty)	To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Information on grievances raised by or involving you	From you, from other employees and from consultants we may engage in relation to the grievance procedure	To perform the employment contract To comply with our legal obligations and to comply with legal, regulatory and corporate governance obligations To defend, bring or establish legal claims Legitimate interests: to maintain employment records and good employment practice	For employee administration, to follow our policies and to deal with grievance matters Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage
Information on conduct issues involving you	From you, from other employees and from consultants we may engage in relation to the conduct procedure	To comply with our legal obligations and to comply with legal, regulatory and corporate governance obligations To defend, bring or establish legal claims Legitimate interests: to maintain employment records and good employment practice, to ensure safe working practices	For employee administration and assessments, to follow our policies, to monitor employee performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage
Details of your appraisals and	From you, from other employees	To comply with our legal obligations	For employee administration and assessments, to follow

performance reviews	and from consultants we may engage in relation to the appraisal/perform ance review process	Legitimate interests: to maintain employment records and good employment practice, to ensure safe working practices To defend, bring or establish legal claims To comply with legal, regulatory and corporate governance obligations	our policies, to monitor employee performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage
Details of your performance management/ improvement plans (if any)	From you, from other employees and from consultants we may engage in relation to the performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and good employment practice, to ensure safe working practices To defend, bring or establish legal claims To comply with legal, regulatory and corporate governance obligations	For employee administration and assessments, to follow our policies and to monitor employee performance and resolve disputes Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage
Information in applications you make for other positions within our organisation	From you	To enter into/perform the employment contract To comply with our legal obligations and to comply with legal, regulatory and corporate governance obligations Legitimate interests: to maintain employment records and good employment practice	To process the application Information shared with relevant managers, HR personnel
Information about your use of our IT, communication and other systems	Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet	Legitimate interests: To monitor and manage employee access to our systems and facilities To protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage To ensure our business policies, such as those concerning security and internet use, are adhered to For operational reasons, such	To protect and carry out our legitimate interests (see adjacent column) Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage

	and Internet facilities, telephones, voicemail, mobile phone records	as maintaining employment records, recording transactions, training and quality control To ensure that commercially sensitive information is kept confidential To check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with For security vetting and investigating complaints and allegations of criminal offences For statistical analysis To prevent unauthorised access and modifications to our systems As part of investigations by regulatory bodies, or in connection with legal proceedings or requests	
Details of your use of business-related social media, such as LinkedIn	From you, relevant websites and applications	Legitimate interests: To monitor and manage employee access to our systems and facilities To protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage To ensure our business policies, such as those concerning security and internet use, are adhered to For operational reasons, such as maintaining employment records, recording transactions, training and quality control To ensure that commercially sensitive information is kept confidential To check that restrictions on your activities that apply after your employment has ended (post-termination restrictions	To protect and carry out our legitimate interests (see adjacent column) Information shared with relevant managers, HR personnel and with consultants we may engage

		or restrictive covenants) are being complied with For security vetting and investigating complaints and allegations of criminal offences As part of investigations by regulatory bodies, or in connection with legal proceedings or requests	
Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)	From relevant websites and applications	Legitimate interests: To monitor and manage employee access to our systems and facilities To protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage To ensure our business	To protect and carry out our legitimate interests (see adjacent column) Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage
		policies, such as those concerning security and internet use, are adhered to For operational reasons, such as maintaining employment records, recording transactions, training and quality control	
		To ensure that commercially sensitive information is kept confidential To check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with	
		For security vetting and investigating complaints and allegations of criminal offences	
		As part of investigations by regulatory bodies, or in connection with legal proceedings or requests	
Details in references about you that we give to others	From your personnel records, our other employees	To perform the employment contract To comply with our legal obligations and to comply	To provide you with the relevant reference To comply with legal/regulatory obligations

with legal, regulatory and corporate governance obligations Legitimate interests: to maintain employment records and good employment practice	Information shared with relevant managers, HR personnel and the recipient(s) of the reference
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Part B – Recruitment

Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address)	From you/from a recruitment consultant	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, academic history, experience, employment history (including job titles, salary and working hours) and interests	From you or from a recruitment consultant on your behalf, in the completed application form, your CV and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision
Your racial or ethnic origin, sex and sexual orientation, age, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies For further information, see * below
Information regarding your criminal record (if needed)	From you, in your completed application form	To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Details of your referees	From your completed	Legitimate interest: to	To carry out a fair

Part C – Recruitment

Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of employment dates, job title and salary from references obtained about you from previous employers and/or education providers	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications 🗆	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) (if needed) -	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from	From you and, where necessary,	To enter into/perform the	To carry out right to

related documents, such as your passport or other identification and immigration information \Box	the Home Office	employment contract To comply with our legal obligations Legitimate interest: to maintain employment	work checks Information may be shared with the Home Office
		records	

Part D – Contractors and agency workers

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (ie address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers)	From you/from your employer	To enter into/perform the services contract Legitimate interest: to maintain records of contractors engaged	To enter into/perform the services contract
Details of payment	From you/from your employer	To perform the services contract including payment of service fee and benefits Legitimate interests: to maintain records of contractors engaged and to comply with legal, regulatory and corporate governance obligations and good practice	To ensure you receive the correct service fee and benefits
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office	To enter into/perform the services contract To comply with our legal obligations Legitimate interest: to maintain records	To carry out right to work checks Information may be shared with the Home Office, identity checking agencies and professional advisors
Your photograph	From you	Legitimate interests: to ensure a safe working environment by helping us and your colleagues to identify you, to help foster a collegiate and	Your photograph is likely to be displayed at the foot of all emails which are sent to or from you and other systems used by Bibby Financial Services

		sociable working environment and to support marketing initiatives	Limited – you are in control of this data and can remove it if you wish. From time to time we may feature you in internal news stories and marketing initiatives on the Hub and on external marketing initiatives (including newsletters, brochures and our website)
Criminal records information, including the results of Disclosure and Barring Service (DBS) checks (if needed)	From you and the DBS	To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty)	To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Information about your use of our IT, communication and other systems	Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records	Legitimate interests: to monitor and manage access to our systems and facilities to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage to ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining contractor engagement records, recording transactions, training and quality control to ensure that commercially sensitive information is kept confidential to check that restrictions on your activities that apply after your engagement has ended for security vetting and investigating complaints	To protect and carry out our legitimate interests (see adjacent column) Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage

		and allegations of criminal offences	
		for statistical analysis	
		to prevent unauthorised access and modifications to our systems	
		as part of investigations by regulatory bodies, or in connection with legal proceedings or requests	
Details of your use of business-related social media, such as LinkedIn	From you, from relevant websites and applications	Legitimate interests: to monitor and manage access to our systems and facilities to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage	To protect and carry out our legitimate interests (see adjacent column) Information shared with relevant managers, HR personnel and with consultants we may engage
		to ensure our business policies, such as those concerning security and internet use, are adhered to	
		for operational reasons, such as maintaining contractor engagement records, recording transactions, training and quality control	
		to ensure that commercially sensitive information is kept confidential	
		to check that restrictions on your activities that apply after your engagement has ended	
		for security vetting and investigating complaints and allegations of criminal offences	
		as part of investigations by regulatory bodies, or in connection with legal proceedings or requests	
Your use of public social media (only in	From relevant websites and applications	Legitimate interests: to monitor and manage	To protect and carry out our legitimate interests

very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)	access to our systems and facilities to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage to ensure our business policies, such as those concerning security and	(see adjacent column) Information shared with relevant managers, HR personnel and with consultants and professional advisors we may engage
	internet use, are adhered to	
	for operational reasons, such as maintaining contractor engagement records, recording transactions, training and quality control	
	to ensure that commercially sensitive information is kept confidential	
	to check that restrictions on your activities that apply after your engagement has ended	
	for security vetting and investigating complaints and allegations of criminal offences	
	as part of investigations by regulatory bodies, or in connection with legal proceedings or requests	

You are required (by law, or under the terms of your engagement contract, or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked ' above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits, such as, for example, your contractual rights to sick pay and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ or engage you, to make these payments or provide these benefits.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Data Protection Policy and in our Criminal Records Information Policy (a copy of each of which is located in our Policy Portal, which can be accessed through our company intranet)

** Your spouse and dependants have the right to know what personal data we hold about them, how we collect it, and how we use and may share that information. Please share this privacy notice with your spouse and any dependants whom you feel are sufficiently mature to understand it. Your spouse and dependants have the right to contact our Data Protection and Compliance Officer to obtain copies of the information which we hold in relation to them and to exercise the other rights under data protection laws.