

Candidate Privacy Notice

1 Introduction

Avantix ("the Company") is committed to protecting the privacy and security of your Personal Data.

This privacy notice describes how we collect and use information about you that could be used to identify you ("Personal Data"), through our recruitment process and as a prospective employee with us, in accordance with the General Data Protection Regulation ("GDPR").

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time and if we do so, we will publish an updated copy of this notice as soon as reasonably practicable. It is important that you read and retain this notice or any updated version of this notice so that you are aware of how and why we are collecting or processing Personal Data about you and what your rights are under data protection legislation.

Avantix is a "data controller". This means we are responsible for deciding how we hold and use Personal Data about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This policy should be read in conjunction with our Privacy and Data Protection Policy which can be found on our website.

2 DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the Personal Data we hold about you must be:

1. Processed in a fair, lawful and transparent way,
2. Collected for specific, explicit, and legitimate purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes,
3. Adequate, relevant, and limited to what is necessary for the purposes or processing,
4. Accurate and kept up to date,
5. Kept only as long as necessary for the purposes we have told you about, and
6. Kept securely.

3 HOW WILL WE USE PERSONAL DATA ABOUT YOU?

We will only use your Personal Data when the law allows us to. The GDPR explains what legal bases data controllers can rely on to legally process Personal Data. Most commonly, the bases we will rely on to use your Personal Data are as follows:

1. Where you have consented to us using your Personal Data, such as when you send us your CV with Personal Data contained in it ("Consent"),
2. Where we need to comply with a legal obligation, such as reporting fraudulent activity or other illegal actions ("Legal Compliance"), and
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests, such as providing a list of our prospective employees to investors as part of a due diligence process; ("Legitimate Interest").

4 WHAT CATEGORIES OF YOUR PERSONAL DATA DO WE COLLECT, STORE AND USE?

Below we list all the categories of Personal Data on prospective employees that we collect, store and use. Not all the following types of data will necessarily be collected from you, but this is the full scope of Personal Data that we collect:

- Personal contact details such as full name, title, addresses, telephone numbers, and personal email addresses,
- Date of birth, gender,
- Right to work documentation, National Insurance number,
- Information gathered via the recruitment process such as that entered into a CV and covering letter,
- Details of your education and employment history,
- Qualifications, licences, (e.g. driving licences), certifications, security clearances,
- References from former employers,
- Psychometric assessment reports and results.

5 WHEN DO WE COLLECT YOUR PERSONAL DATA AND WHAT IS OUR LEGAL BASIS FOR COLLECTING IT?

Under the GDPR you are entitled to understand exactly when we collect various categories of your Personal Data and what legal justification we rely on to use that Personal Data.

The table below contains the activity that gives rise to the Personal Data collection and the lawful basis for collecting, processing, and using that Personal Data. Please refer to section 1.2 entitled "How Will We Use Personal Data About You?" to understand more about the legal basis we rely on.

Examples provided in the table below are indicative in nature and the purposes for which we use your data may be broader than described, but we will never process your data without a legal basis for doing so and for a related purpose.

Activity requiring your data	Lawful Basis for Processing Data
Recruitment and candidate shortlisting and contact in relation to your participation in our recruitment and selection processes	Consent
Decision making in relation to making offers of employment	Legitimate Interest
Carrying out checks on your right to work in the UK and to take up the work offered by us	Legal Compliance
Making reasonable adjustments in the case of a disability	Legal Compliance
Making decisions about salary and benefits to provide to you	Legitimate Interest
Assessing and making decisions on training and development needs	Legitimate Interest
Dealing with legal claims made against us	Legal Compliance
Preventing fraud	Legal Compliance

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably

consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Failing to provide Personal Data

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as making a written offer of employment), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our team).

6 SPECIAL CATEGORIES OF PERSONAL DATA

Special Categories of Personal Data mean data relating to race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

We do not collect any Special Categories of Personal Data about you. Nor do we collect any information about criminal convictions and offences.

We will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

7 SHARING PERSONAL DATA WITH THIRD PARTIES

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your Personal Data outside the EU. If we do, you can expect a similar degree of protection in respect of your Personal Data.

We will only share your Personal Data with third parties in accordance with the GDPR and as outlined in the legal justification table above. 'Third parties' include:

- Third-party service providers (including contractors and designated agents) and other entities within our group. Examples of the services we may receive from third-parties that would require us to share team Personal Data could include: recruitment agencies, vetting agencies, legal services, IT services, etc.,
- Other entities in our group structure (if applicable),
- Third parties in the context of a possible sale or restructure. In this situation we will, as far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your Personal Data with the other parties if and to the extent required under the terms of the transaction. We may need to share your Personal Data with a regulator or to otherwise comply with the law. This may include making returns to HMRC or disclosures to shareholders such as directors' remuneration reporting requirements.

If you would like to know exactly which third parties have been given access to your Personal Data by us, please contact the Company.

8 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.

9 DATA RETENTION

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, which, in relation to unsuccessful candidates, is 6-12 months. If your application is not successful and we have not sought consent, or you have not provided consent to our request to keep your data for the purpose of future suitable job vacancies, then we will keep your data for six months once the recruitment exercise ends. If we have sought your consent to keep your data on file for future job vacancies and you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent. If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate Employee Privacy Policy which will be provided to you. In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

10 YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it,
- b) the right of access to the data we hold on you,
- c) the right for any inaccuracies in the data we hold on you, however they become known, to be corrected. This is also known as 'rectification',
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure',
- e) the right to restrict the processing of the data,
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability',
- g) the right to object to the inclusion of any information,
- h) the right to regulate any automated decision-making and profiling of personal data.

No Fee Usually Required

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

11 RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Company at privacy@avantix.co.uk. Once we have received notification that you have withdrawn your

consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12 *AUTOMATED DECISION MAKING*

Automated decision-making means making decision about you using no human involvement, e.g. using computerized filtering equipment. No decision will be made about you solely based on automated decision making, i.e. using an electronic system without human involvement which has a significant impact on you

13 *MAKING A COMPLAINT*

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (“ICO”). You can contact the ICO by telephone on 0303 123 1113.

14 *CHANGES TO THIS PRIVACY NOTICE*

We reserve the right to update this privacy notice at any time, and we will publish a new privacy notice when we make any substantial updates.