



Fair Processing Notice

Towergate Health & Protection – Recruitment

Fair Processing Notice (Job applicants and recruitment)

The privacy and security of your information is important to us. This notice applies to individuals seeking employment or engagement with us. It explains who we are, the types of information we collect, how we use it, who we share it with and how long we keep it. It also informs you of certain rights you have regarding your personal information under current data protection law. You can find out more about data protection from the Information Commissioner's Office here: <https://ico.org.uk/>.

Who are we?

Towergate Health & Protection is a trading name of Towergate Underwriting Group Limited and Chase Templeton Limited, which are subsidiaries of The Ardonagh Group, and are the Data Controllers of the information you provide us with. We are registered with the Information Commissioner's Office for this purpose.

You can contact us for general data protection queries by email to DataProtection@ardonagh.com or in writing to The Data Protection Officer, care of the office of the Chief Information Officer, The Ardonagh Group, 55 Bishopsgate, London, EC2N 3AS. Please advise us of as much detail as possible to help us comply with your request.

For further information about The Ardonagh Group of companies please visit <http://www.ardonagh.com/>.

What information do we collect?

We, and other Ardonagh Group companies on our behalf, will collect information about you. Information will include your name, telephone number, email address, postal address, date of birth and other details. For example, this may include your employment history, references, ID, evidence of right to work, education and qualifications, current and expected remuneration, benefits expectations, interview notes, psychometric test results or companies house checks (depending on role), as well as any other information you choose to provide us with in support of your application (e.g. letters of introduction).

Information collated about you as part of your application and recruitment process may be provided by you or, in some cases, by an agent you have authorised to do so on your behalf. We may also obtain information from external sources such as referees and publicly available sources.

We may also use CCTV at our offices and calls made with our staff may be recorded, all of which may include information about you.

Sometimes we may need to request and collect particularly sensitive information about you. This might include information in relation to your health or medical records but certain other information is also deemed to be particularly sensitive. More information can be found at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>. Where we need this information, we will obtain your explicit consent unless this is required by law or the information is required to protect your health.

You may have already provided explicit consent for this information to be shared with us for the purpose of a job application via a recruitment agency or through someone you have authorised to act on your behalf.

How we use your information

We keep and process information about you for job application and recruitment purposes. This includes using information about you to enable us to assess or shortlist candidates, comply with any legal requirements, pursue the legitimate interests of The Ardonagh Group and to protect our position in relation to legal proceedings.

For example, we and other Ardonagh Group companies and third parties on our behalf, will use your personal information (including sensitive information) to:

- Assess and process your job application
- Communicate with you or your authorised agent or representative about your application
- Arrange any assessments, meetings or interviews as necessary

- Enable relevant checks and screening to be undertaken to confirm who you say you are, your eligibility to work and that you are a reliable and trustworthy person to undertake the role you have applied for
- Enable criminal record checks, where required for the role
- Disclose any information where we are legally obliged to do so
- Retain information that is necessary for continued engagement (for successful applicants)
- Protect and further our legitimate interests as a business
- Detect and prevent fraud or other criminal activity
- We may check information provided to us against publicly available sources for accuracy

Securing your personal information

We and other Ardonagh Group companies follow strict security procedures in the storage and disclosure of your personal information, including storage in electronic and paper formats. If we provide information to a third party we will require it and any of its agents and/or suppliers to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Fair Processing Notice.

Any new information you provide us may be used to update an existing record we hold for you.

When do we share your information?

We will share information within The Ardonagh Group of companies where it is necessary in connection with your application or recruitment.

We will also share information with third parties we use to carry out certain processes on our behalf as data processors, for example recruitment services, pre-employment screening and security checks as well as third parties and regulators requiring information such as the Department of Work and Pensions.

We may be obliged or allowed by law to pass on your information to the police or other law enforcement body or statutory or regulatory authority.

We may also share your information with anyone you have authorised to deal with us on your behalf.

The information we collect about you may be transferred to, and stored at, a destination outside of the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, providing you with information you have requested or providing The Ardonagh Group companies with IT services.

How long do we keep your information for?

We will not keep your personal information longer than is necessary for the purpose for which it was provided unless we are required by law or have other legitimate reasons to keep it for longer, for example if necessary to protect our position in legal proceedings.

We and other Ardonagh Group companies will normally keep information for no more than 12 months after the application has ended unless you are successfully appointed, in which case we will retain information throughout the period of your employment (or engagement) and generally for no more than 7 years after you have ceased working for us.

Your rights

There are a number of rights that you have under data protection law. Commonly exercised rights are:

- Access – you may reasonably request a copy of the information we hold about you. ICO guidance
- Erasure – where we have no legitimate reason to continue to hold your information, you have the right to have your data deleted (sometimes known as the right to be forgotten). ICO guidance

- We may use automated decision making in processing your personal information for some services and products. You can request a manual review of the accuracy of an automated decision if you are unhappy with it. ICO guidance
- Marketing – If you wish to inform us of changes in consent for marketing, please contact us at the address or telephone number indicated in any recent correspondence or emails you have received from us.

If you are unhappy about the way we have handled your data or upheld your rights, you can complain to the Information Commissioner's Office (ICO) at any time.

Further details of your rights can be obtained by visiting the ICO website at <https://ico.org.uk/your-data-matters/>.