Privacy Notice for Job Applications

1. Introduction

Reclaim Fund Ltd ("RFL", "we", "us" or "our") is committed to protecting your personal data and being transparent about how we use it. This privacy notice explains how we collect, use, store and share personal data about individuals who apply for roles with us, including prospective employees, workers, contractors, directors and non-executive directors.

RFL is the controller of the personal data described in this notice. This means we decide how and why your personal data is used. This notice does not form part of any contract of employment or engagement.

2. What Personal Data We Collect

During the recruitment process, we may collect and use the following types of personal data about you:

- contact details, such as your name, address, personal email address and telephone number;
- information contained in your CV, cover letter, application form or candidate profile, including your education, qualifications, employment history, skills and experience;
- information you provide during interviews, assessments or other recruitment activities;
- interview notes, assessment outcomes and records of recruitment decisions;
- references and information from former employers or other referees, where obtained;
- right-to-work information and identity documents, where required;
- background screening information, which may include criminal offence data or credit check information where this is relevant to the role and permitted by law; and

- equal opportunities monitoring information, where you choose to provide it.

3. Special Category and Criminal Offence Data

Some personal data is given extra protection under data protection law. This includes information about health, racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, genetic or biometric data used for identification purposes, or sexual orientation. We may process this type of information where it is necessary and relevant to the recruitment process, for example to make reasonable adjustments, to carry out equal opportunities monitoring, or to comply with employment law obligations.

We may also process information about criminal convictions or offences where permitted by law and where necessary and relevant to the role, for example as part of appropriate background checks. We will only process this information where appropriate safeguards are in place.

4. How We Collect Personal Data

We may collect personal data directly from you, for example when you apply for a role, provide information during the recruitment process, attend an interview or correspond with us. We may also receive personal data from third parties, such as recruitment agencies, job boards, professional networking sites, referees, former employers, background screening providers, credit reference agencies and publicly available sources.

5. How We Use Your Personal Data and our Lawful Bases

We use your personal data for the purposes set out below. We will only use your personal data where we have a lawful basis under data protection law.

Purpose	**Personal data used**	**Lawful basis**

Managing and progressing your application	Contact details, CV, application information, interview notes, assessment outcomes and recruitment decision records	Legitimate interests in running a fair, transparent and effective recruitment process; taking steps at your request before entering into a contract where applicable
Assessing your suitability for the role	Qualifications, employment history, skills, experience, interview responses and assessment results	Legitimate interests in selecting suitable candidates and managing recruitment effectively
Carrying out right-to-work checks	Identity documents, right-to-work information and related records	Compliance with legal obligations
Obtaining references and carrying out background checks where relevant to the role	Reference information, employment history, identity information, criminal offence data or credit check information where permitted and relevant	Compliance with legal or regulatory obligations; legitimate interests in verifying suitability and protecting RFL, its staff and stakeholders
Making reasonable adjustments	Health or disability information you choose to provide	Compliance with employment law obligations and, where special category data is used, the relevant employment law condition under data protection law
Equal opportunities monitoring	Information such as ethnicity, disability, sex, age or other diversity information where you choose to provide it	Legitimate interests in monitoring and improving recruitment practices; reasons of substantial public interest where special category data is processed
Responding to queries, complaints or legal claims	Application records, correspondence, interview notes and recruitment decision records	Legitimate interests in responding to queries and defending or establishing legal claims; compliance with legal obligations where applicable

6. If You Do Not Provide Personal Data

You do not have to provide personal data to us. However, if you do not provide information that we need for the recruitment process, we may not be able to assess your application, progress your candidacy, make reasonable adjustments, verify your right to work or comply with legal or regulatory requirements.

7. Who We Share Your Personal Data With

We will only share your personal data where it is necessary and lawful to do so. This may include sharing personal data with recruitment agencies, background screening providers, credit reference agencies, referees, former employers, professional advisers, IT and HR system providers, and government or regulatory bodies such as the Financial Conduct Authority or the Information Commissioner's Office where required.

We do not share applicant personal data with third parties for marketing purposes.

8. International Transfers

We may need to transfer your personal data outside the UK where our service providers, agents, subcontractors or regulatory authorities are based outside the UK. Where this happens, we will ensure that appropriate safeguards are in place, such as transferring data to a country covered by UK adequacy regulations or using contractual protections approved under UK data protection law.

9. How Long We Keep Your Personal Data

If your application is unsuccessful, we will normally retain your personal data for 12 months after the recruitment process has concluded, after which it will be securely deleted, unless we are required to keep it for longer in connection with a legal or regulatory obligation, or to establish, exercise or defend legal claims.

If you give us consent to keep your details on file for future opportunities, we may retain your personal data for that purpose for the period explained to you when we ask for your consent. You can withdraw your consent at any time by contacting the Data Protection Officer.

If your application is successful, the personal data we collected during recruitment will become part of your employment or engagement record and will be handled in line with our staff privacy notice and records retention procedures.

10. Automated Decision-Making

We do not currently make recruitment decisions based solely on automated decision-making that produces legal or similarly significant effects. If this changes, we will provide appropriate information before using such processes.

11. Your Rights

You have rights in relation to your personal data. These include the right to request access to your personal data, ask us to correct inaccurate or incomplete information, ask us to erase or restrict the use of your personal data, object to certain processing, request data portability in some circumstances, and withdraw consent where we rely on consent.

These rights are not absolute and may not apply in every case. If you wish to exercise your rights, please contact the Data Protection Officer using the contact details provided in this notice.

12. How to Contact us or Raise a Concern

If you have any questions about this notice or how we use your personal data, please contact RFL's Data Protection Officer.

You can contact the Data Protection Officer by emailing reclaimfund@reclaimfund.co.uk or writing to Reclaim Fund Ltd at Emperor Court, 2 Emperor Way, Crewe, Cheshire, CW1 6BD.

You also have the right to complain to the Information Commissioner's Office, the UK supervisory authority for data protection. We encourage you to contact us first so we can try to resolve any concerns.

The ICO can be contacted through its website at ico.org.uk or by telephone on 0303 123 1113.

13. Updates to this Notice

We may update this notice from time to time. Where appropriate, we will bring significant changes to the attention of applicants.