



Job Applicant Privacy Notice

Who needs to read this Privacy Notice

You should read this privacy notice if you are applying for a role with Rothesay Life Plc (or any other company in the Rothesay Group).

About us

Rothesay Life Plc is an insurance company established in the UK with company registration number 06127279. We are authorised in the UK by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Rothesay Pension Management Limited is a group company of Rothesay Life Plc. Rothesay Pension Management Limited employs individuals who carry out the day to day operation of Rothesay Life Plc. The registered office address for Rothesay Life Plc and Rothesay Pension Management Limited is The Post Building, 100 Museum Street, London WC1A 1PB.

Together Rothesay Life Plc and Rothesay Life Pension Management Limited make decisions about employees and their employment. As a result we are joint **controllers** under **data protection laws** when we **process** your **personal data** in order to make decisions about our employees and prospective employees. This means we have a legal responsibility to ensure that we, and other companies with whom we share your **personal data**, **process** your **personal data** securely and lawfully in accordance with the **data protection laws**.

This privacy notice applies to **processing** of your **personal data** by each of Rothesay Pension Management Limited and Rothesay Life Plc. We are required to provide you with the information in this privacy notice in order to comply with our legal obligations. Please read it carefully – we take the privacy of your **personal data** very seriously.

About this document

This privacy notice contains information about:

- The **personal data** that we **process** as joint **controllers**
- The reasons why we **process** your **personal data**
- The legal grounds upon which we **process** your **personal data**
- The security measures that we have in place to keep your **personal data** secure
- The length of time we store your **personal data** for
- The organisations with whom we might share your **personal data**
- The rights you have under the **data protection laws** in relation to our **processing** of your **personal data**

If you are reading this document electronically you can click on the page numbers shown in the contents table on the next page to jump straight to that page. There are also embedded links throughout the document shown in **bold dark blue** to help you to navigate through the document if reading online.

Understanding the terms used in this privacy notice

The meaning of words which are shown in **bold apricot** text are explained in the **Glossary**. Throughout this notice any reference to “we” or “us” refers to Rothesay Life Plc and Rothesay Life Pension Management Limited.

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Please note that we may change this privacy notice from time to time

The latest version of our privacy notice can be found on our website (www.rothesaylife.com/data-protection) or can be requested from us using the contact details contained in the part of this privacy notice headed **Contact details**. We will notify you if the purposes for which we **process** your **personal data** change.

What personal data do we collect?

The sections below set out the categories of **personal data** we may ask for at each stage of your application for a job with us. Some data may not be required depending on the type of role you are applying for. The reasons why we need each category of data are set out in the section '**Why do we process your personal data**'.

If you choose not to provide us with any of these categories of information, your application may be rejected or it could affect our ability to process your application.

Pre-application

If you contact us with any questions prior to submitting an application for a job, we will keep a record of your name and contact details, as well as details of any question you have asked.

If you submit an application or send us a CV

If you submit an application for a job with us, we will ask you for:

- Your contact details, including your name, address, e-mail address and telephone number
- Details of your relevant education and employment history

If you submit a CV to us and it contains additional information, we will process whatever information you provide in your CV.

Assessment stage

If you are successful in our initial shortlisting stage, we may invite you for an interview, assessment day, or to complete online tests. Information will be generated by you and by us during this process. For example, you might complete written tests, undertake group exercises, take psychometric tests or we might take interview notes.

If we make you a conditional offer

If we make you a conditional offer of employment, we may gather further **personal data** before deciding whether to make you a final offer, to check:

- Proof of your identity
- Proof of your qualifications
- Pre-employment health questionnaire
- Credit check (role dependent)
- Right to Work checks
- Adverse media check
- Criminal checks on unspent convictions

In addition, if you are applying for an **SMCR** role, we are required by law to carry out certain checks to ensure that you are a 'fit and proper person' to hold this type of role. The personal data required is prescribed by regulatory requirements. You will be asked to include **criminal offences data** (of spent and unspent convictions) and information about any bankruptcy.

If we make and you accept a final offer

We will require further information from you in order to meet our obligations as an employer, such as your bank details so that we can pay your salary. How we process your information as an employee is set out in our **Staff Privacy Notice** which you will have access to when you start your employment.

Personal information provided by third parties

Most of the **personal data** we **process** about you when you apply for a job is information that you give us directly, or is generated through the recruitment exercise. However, some information we gather from the third parties below.

Recruitment Agency: We fill some of our roles through recruitment agencies. If you apply for a role through them, they will pass us details of your name, contact details, CV, notes of interview with the agency.

Your former employer and other referees: If you apply for a role with us, we will contact your referees directly, using the details you provide in your application, to request a reference.

Background checking vendor: We need to confirm the identity of everyone who applies for a job with us. We use recognised providers to confirm address and employment history. We also carry out credit checks on those applying for certain roles where we will give the provider your name and other basic details and the provider will tell us of any credit history issues, which we will then discuss further with you.

Disclosure and Barring Service: If we are required to carry out a DBS check for your role, the Disclosure and Barring Service will provide us with information about your criminal record, including spent convictions.

Home Office: We may in certain circumstances need to seek confirmation from the Home Office that you have the right to work in the UK.

Why do we process your personal data?

We **process personal data** as **controller** for the purposes listed below.

We are allowed to do so on certain legal grounds which are also set out in the table (and which are explained further in the section '**Legal grounds for processing personal data**').

Please be assured that, in respect of all **processing** of **personal data** that we or our third parties carry out, we have robust technical, security and organisational measures in place to ensure that the risk of a privacy breach by us, or one of the third parties with whom we share **personal data**, is low.

Personal data

Type of data	Why do we need it?	Legal grounds for processing
Contact details (name, email address, telephone number, home address).	So that we can contact you about your application for a job with us.	Legitimate interests
Education and employment history, and proof of qualifications.	So that we can assess your relevant experience and suitability for a job with us, and assess what your training needs would be if you started working for us.	Legitimate interests
Information provided by professional and personal referees.	So that we can assess your relevant experience and suitability for a job with us.	Legitimate interests
Information generated during the recruitment process itself (such as interview notes, psychometric test results and your answers to assessment questions).	So that we can assess your relevant experience and suitability for a job with us. Psychometric tests help us understand your characteristics and working-style preferences.	Legitimate interests
Credit check information.	So that we can assess suitability for senior roles or roles involving financial duties.	Legitimate interests Compliance with a legal obligation
Information about your regulatory or other professional memberships.	<p>For regulatory positions: so that we can comply with our legal obligation (and obligation to our professional insurers) to make sure that individuals carrying out certain regulated roles are appropriately registered.</p> <p>For professional positions: So that we can assess your relevant experience and suitability for a job with us (where this is relevant for certain senior roles where there is no legal requirement to be registered with a regulator).</p>	Compliance with a legal obligation

Sensitive personal data and criminal offences data

Type of data	Why do we need it?	Legal grounds for processing
Identity documents such as a copy of your passport (including information about your national origin) or other right to work documentation.	So that we can comply with our obligation to check that our employees have the right to work in the UK.	Necessary for complying with our legal obligations as an employer.
Information about a disability which may affect the application process.	To make reasonable adjustments to our application process for your disability.	Necessary for complying with our legal obligations as an employer.
Pre-employment health data.	To determine whether you are medically able to carry out the work you have been offered, and to assess whether any adjustments are needed to the work environment to enable you to carry out that work.	Necessary for complying with our legal obligations as an employer. Necessary for assessing your working capacity as an employee.
Self-declaration of any unspent criminal convictions.	To meet our legal obligation to check whether there are any unspent criminal convictions which would prevent you from working in the role you have applied for.	Necessary for complying with our legal obligations as an employer.
Information obtained from the Disclosure and Barring Service.	To meet our legal obligation to check whether there are any unspent criminal convictions which would prevent you from working in the role you have applied for. For some roles, we also need to consider any spent criminal convictions.	Necessary for complying with our legal obligations as an employer and under the FCA regime for authorised persons.

Legal grounds for processing personal data

We have set out below a description about each of the legal grounds on which we **process** your **personal data**.

Reasons for processing your personal data

Necessary for our legitimate interests

We process some **personal data** if doing so is in our legitimate interests as an employer. In order to do so, we have considered the impact on your interests and rights, and have put in place appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You can object to **processing** that we carry out on the grounds of legitimate interests. See the section headed **Your rights** to find out how.

Necessary for the compliance of a legal obligation

We have to process some of your **personal data** in order to comply with certain of our legal obligations.

Necessary to establish, exercise or defend legal claims

We may need to **process personal data** in order to exercise our legal rights and bring or defend claims.

Additional conditions for processing sensitive personal or criminal offences data

Necessary for compliance with our obligations under employment law and regulations

We have to process some **sensitive personal data** in order to comply with certain of our legal obligations as an employer and under the Financial Conduct Authority's regime as an insurer.

Necessary for the purposes of occupational medicine, including the assessment of your working capacity as an employee

We will process information about your health in order to assess your medical capacity to perform the job you have applied for.

Necessary to establish, exercise or defend legal claims

We may need to **process sensitive personal data** in order to exercise our legal rights and bring or defend claims.

How do we keep your personal data secure?

We take the security of information, infrastructure and applications very seriously. Our commitment to corporate security is demonstrated through the implementation of policies, controls and procedures, which are externally certified and audited to the international information security standard, ISO 27001:2013. In addition, we are certified to Cyber Essentials, a government-backed scheme demonstrating cyber security.

Our security policies, controls and procedures are regularly reviewed and updated so that we maintain good practices across our business to keep your information safe.

We have contractual arrangements in place with all of our service providers who **process personal data** which are compliant with **data protection laws**. We regularly check that our service providers are complying with their contractual commitments. This includes assessing and reporting on our service providers' information security controls to check their compliance using questionnaires and/or on-site audits.

How long do we store your personal data?

If your application for a role with us is unsuccessful prior to an interview, we will promptly delete your data.

If your application for a role with us is unsuccessful following an interview or you choose not to accept our offer of employment, we would like to retain your records so that we can contact you in the future if a role is available which you would be eligible for. You can ask us to remove your information at any time and each year we will contact you directly to check that you are still happy for us to retain your information.

If your application for a job with us is successful and you start work as our employee, please see the Staff Privacy Notice for details of how long we will retain the data gathered during the recruitment exercise. If you apply for a new role with us when you are already our employee, this privacy notice applies in respect of any new information gathered during that application process, and the Staff Privacy Notice continues to apply in respect of any information we already hold by virtue of you being a current employee.

Who has access to your personal data?

We share **personal data** with a variety of other companies in order to facilitate and enable us to process your application. However, we only share the **personal data** that those companies need to provide their services to us.

We have detailed the types of companies with whom we currently share **personal data** below. The companies fall into two categories:

- **Processors with whom we share personal data**
For these companies, we determine the purposes for which the **personal data** we pass to them is processed and they should not process that **personal data** other than in accordance with our written instructions.
- **Controllers with whom we share personal data**
For these companies, we do not determine the purposes for which the **personal data** we pass to them is **processed**. To understand how the other **controllers process** your **personal data** you should refer to their privacy notices.

Processors with whom we share personal data

1. Background and criminal record checks

We use Goldman Sachs who engages other agencies such as Verifile and Hireright to conduct independent checks on your address and employment background. These checks include **criminal offences data** if you have unspent convictions and, for certain roles, spent convictions.

2. Professional advisers

We sometimes have to share **personal data** with our professional advisers (including accountants and lawyers) where it is relevant for the purposes of their advice.

3. IT service providers

Our main IT infrastructure and core software is provided by Goldman Sachs. This means that **personal data** we **process** is stored on Goldman Sachs' IT systems.

4. Other service providers to our business

Other companies who **process personal data** on our behalf include those who provide day-to-day operational business services such as archiving, document scanning and copying, document destruction and printing.

Controllers with whom we share personal data

1. Law enforcement and government organisations

We disclose **personal data** of staff to law enforcement agencies and regulators where we are required by law to do so, such as for SMCR staff checks. We will disclose information to the police, law enforcement agencies or regulators where we are required to do so by law.

2. Transfers outside of the European Economic Area

If you have lived abroad for more than 3 years in the previous 5 years, we will contact the relevant criminal records systems in that country to check for unspent convictions.

If there is a role there that we believe you would be eligible for in one of the other companies in the Rothesay Group, we may send your application or CV to that company.

Your rights

You have the following rights under **data protection laws**:

- The right to object to us **processing** your **personal data**
- The right to correct any mistakes in your **personal data**
- The right to restrict our **processing** of your **personal data**
- The right of access to **personal data** relating to you (known as 'Subject Access Requests')
- The right to require us to delete your **personal data**
- Rights in relation to automated decision-making (not relevant here)
- The right to have your personal data provided to another **controller** (not relevant here)

These rights are described in the following section **Your rights in more detail**.

How to exercise your rights

If you wish to exercise any of your rights, please contact us using the details contained in the part of this privacy notice headed **Contact details**.

When seeking to exercise any of your rights, please ensure that your request contains sufficient information and supporting documentation to enable us to consider your request and take appropriate action.

There are exemptions that apply to some of your rights. If any of these are applicable such that we are unable to comply with your request to exercise any of your rights, we will confirm this to you when responding to your request and apply those exemptions in accordance with **data protection laws**.

What will happen if your rights are breached?

You might be entitled to compensation for any damage caused by contravention of **data protection laws**.

Your rights in more detail

Your right to object to us processing your personal data

You may object to us **processing** your **personal data** where we rely on a legitimate interest as our legal grounds for **processing**. The section headed **Legal grounds for processing personal data** explains where this is the case.

If you object to us **processing** your **personal data** we will no longer be able to **process** your **personal data** unless we can demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in the section headed **Legal grounds for processing personal data**. Please note if you object, we will not be able to consider your application.

Your right to correct any mistakes in your personal data

You can require us to correct any mistakes (including adding missing information) in any of your **personal data** which we hold.

Your right to restrict our processing of your personal data

You may request that we restrict the **processing** of your **personal data** in any of the following circumstances:

- Where you do not think that your **personal data** is accurate. In this case we will start **processing** again once we have checked the accuracy of your **personal data** and it has been corrected if necessary
- Where the **processing** is unlawful, but you do not want us to erase your **personal data**
- Where we no longer need the **personal data** for the purposes of our **processing**, but you need the data to establish, exercise or defend legal claims
- Where you have objected to **processing** because you believe that your interests should override our legitimate interests. In this case we will start **processing** again once we have checked whether or not our legitimate interests override your interests

If our **processing** is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

Your right to access your personal data (Subject Access Request)

You can ask us to confirm whether we are **processing personal data** relating to you. If we do, you may ask us to provide the following:

- A copy of your **personal data** (please note that, if you want more than one copy of your **personal data**, we reserve the right to charge a reasonable fee based on our administrative costs for the provision of such further copies)
- Details of the purpose for which your **personal data** is being, or is to be, **processed**
- Details of the recipients or classes of recipients to whom your **personal data** is, or might be, disclosed, including, if the recipient is based in a country outside of the European Union, what protections are in place in relation to the transfer to that recipient
- The period for which your **personal data** is held (or the criteria we use to determine how long it is held)
- Any information available about where we obtained your **personal data** from
- Confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling

Your right to require us to delete your personal data

You can ask us to delete your **personal data** in any of the following circumstances:

- You believe that we no longer need to **process** it for the purposes set out in this privacy notice
- You had given us consent to **process** it, but you withdraw that consent and there are no other legal grounds upon which we can **process** it
- You have successfully objected to our **processing** it
- It has been **processed** unlawfully or has not been erased when it should have been

Your rights in relation to automated decision-making

You have the right to ask a **controller** to review manually any automated decisions the **controller** makes about you. However, please note that we do not carry out decision-making by automated means with any **personal data** of applicants.

Your right to have your personal data provided to another controller

In specified circumstances, an individual can ask a **controller** to provide them with an electronic copy of **personal data** that the **controller** holds, or to have such a copy transmitted directly to another **controller**. This right does not apply here.

Contact details

Any queries about this privacy notice or our handling of your **personal data** should be directed to Head of Resourcing and Talent at Rothesay Life Plc who will handle all queries and requests on behalf of both Rothesay Life Plc and Rothesay Life Pensions Management Limited.

How to contact us

You may want to contact us to:

- Ask any questions you have in relation to the information contained in this privacy notice
- Exercise any of your rights under the **data protection laws**
- Request a version of this privacy notice printed in large print or braille
- Request an audio version of this privacy notice
- Make a complaint (see below)

To contact us you can email us at rlcareers@rothesaylife.com or write to:

Careers Department
Rothesay Life Plc
The Post Building
100 Museum Street
London WC1A 1PB

How to make a complaint

If you have a problem or concern relating to the matters set out in this privacy notice that you would like us to look into, please contact us in the first instance using the details set out above.

We hope that we will be able to address the problem or concern to your satisfaction. However, if you remain unsatisfied you will have the right to make a complaint to the Information Commissioner's Office.

The process for making a complaint to the Information Commissioner's Office can be found on its website: www.ico.org.uk

Glossary

The terms shown in **bold apricot** in this privacy notice have the meanings shown below.

criminal offences data: any information relating to criminal convictions and offences committed or allegedly committed

controller: the person who determines the purposes for which, and the manner in which, any **personal data** is **processed**

data protection laws: the **GDPR** and any other data protection or privacy laws, regulations and provisions which apply in the UK from time to time

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation)

personal data: any information from which a living individual can be identified, including:

- Information such as names, addresses, telephone numbers, e-mail addresses, photographs, voice recordings and financial information
- Expressions of opinion and indications of intentions about individuals (and their own expressions of opinion/intentions)
- Information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future

processor: any person or service provider who **processes personal data** on behalf of a **controller**

processing or **process**: This covers almost anything a company or individual can do with **personal data**, including:

- Obtaining, recording, retrieving, consulting or holding it
- Organising, adapting or updating it
- Disclosing, sharing or otherwise making it available
- Cleansing, blocking, erasing or destroying it

Rothesay Group: Rothesay Life Plc and all other companies whose ultimate parent company is Rothesay Holdco UK Limited (Registered number: 08668809). Details of the UK companies in the Rothesay Group are provided here: www.rothesaylife.com/rothesay-group

Senior Managers & Certification Regime ('SMCR'): any information relating to any of the following:

- Individuals who perform significant influence functions and are approved by the FCA/PRA as 'Senior Managers' or 'Approved Persons' at current firm or applying to perform these roles at Rothesay Life
- Individuals who perform 'Certification' functions at current firm and/or applying to perform these roles at Rothesay Life

sensitive personal data: any information relating to any of the following:

- Racial or ethnic origin
- Political opinions
- Religious beliefs or beliefs of a similar nature
- Trade union membership
- Physical or mental health
- Sexual life or orientation
- Genetic data or biometric data for the purpose of uniquely identifying an individual

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