

## **Recruitment Privacy Notice**

**Axiom Limited: Registered office 17 Hatfields, London, SE1 8DJ**

**Company Registration no 1182318**

### **What is the purpose of this Notice?**

As part of any recruitment process our company collects and processes personal data related to job applicants. We are therefore a data “controller” which means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR) and explains your rights in connection with this data.

### **Data protection principles**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **The kind of information we hold about you**

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, education background.
- Any information you provide to us during an interview and the results of any tests you complete as part of your application.
- Information about your current remuneration including benefits entitlements

We may also collect, store and use the following types of more sensitive personal information:

- Information about your health, including any medical condition for which we need to make reasonable adjustments during the recruitment process.
- Information about criminal convictions and offences, where we have a legal or regulatory requirement to process this information for the role you are applying for.

## **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect the following categories of data: names, email addresses, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, education background and current remuneration.
- Background check providers, from which we collect the following categories of data: confirmation that your education qualifications and previous employment details are correct, and credit checks and criminal convictions checks where your role requires us to perform these checks and therefore handle this data.
- Your named referees, from whom we collect the following categories of data: employment history and work performance.
- Data from third parties from a publicly accessible source such as LinkedIn and job boards where you have posted your details.

## **How we will use information about you**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to role since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV and covering letter or your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role we will then take up references and carry out a criminal record check if your role requires us to do so, before confirming your appointment

## **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## **How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We may use information on gender for equal opportunities monitoring purposes

### **Information about criminal convictions**

We envisage that we may process information about criminal convictions post acceptance of an offer. We will collect information about your criminal convictions history if we offer you a role which we are legally required, or required by a regulatory body, to carry out a criminal record check (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data sharing**

#### **Why might you share my personal information with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application: Recruitment agencies throughout the recruitment stage. Your data will be hosted in WorkDay in the USA, as our HRIS and applicant tracking software. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

### **Transferring information outside the EU**

We will transfer the personal information we collect about you to a country outside the EU namely the United States (US) in order to perform our contract with you, pursue our legitimate interests and to comply with our legal obligations. Acxiom complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union to the United States to ensure that there is an adequate level of protection for your data. You can view our certification under this program [here](#). Acxiom also ensures that your personal information is treated in a way that respects both the EU and UK laws of data protection. If you require further information about this or our other protective measures you can request this from the UK Data Protection Officer for Acxiom, [dataprotection@acxiom.com](mailto:dataprotection@acxiom.com)

### **Data retention**

#### **How long will you use my information for?**

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the role. During this period, you may log into your account and apply for other available roles at Acxiom.

We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis. If you are no longer interested in being considered for new roles, please contact [UK-HR@Acxiom.com](mailto:UK-HR@Acxiom.com)

## **Rights of access, correction, erasure, and restriction**

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [UK-HR@acxiom.com](mailto:UK-HR@acxiom.com)

## **Data protection officer**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO who may be contacted at our registered address or at [dataprotection@acxiom.com](mailto:dataprotection@acxiom.com). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.