

FINANCE IRELAND

PRIVACY NOTICE - Recruitment

Finance Ireland Credit Solutions DAC is the Data Controller for all job applicant data, for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament on the protection of natural persons about the processing of personal data and on the free movement of such data. We have created this Notice to demonstrate our firm commitment to privacy and to inform job applicants about the information we collect and process about your application. We commit that all the data sent to us is processed fairly and lawfully, with due care and attention. The data you submit will be used in accordance with the purposes set out in the notice. If you have any queries about this notice, please contact us at privacy@financeireland.com.

This notice sets out an explanation of what information we process about you, why we process your information, with whom your information is shared and a description of your rights with respect to your information.

What information do we process?

When you apply for a role with us we collect your personal information to perform the recruitment function. We also need to keep and process certain information about your application to comply with our legal obligations and, where necessary, to protect our legitimate business interests. We will collect and process information from you during the recruitment process, during our employment relationship and following the termination of our employment relationship.

Personal data is normally obtained directly from you through completion of the on-line application form, your CV and other details you provide to us in support of your application. The personal data will be requested, stored, processed, used and disclosed by Finance Ireland Credit Solutions DAC to:

- Communicate with you.
- Evaluate data about you against vacancies which we may have to determine your suitability. We will keep your data on our database for one year post your application.
- Contact third-parties. The contact may include reference checking from previous employers, qualification checks, criminal reference checking services and/or psychometric evaluation or skill tests. Where relevant to the nature of the work, the organisation may make an application to the Garda Vetting Bureau for Garda clearance or to the Central Bank for the purposes of fitness and probity certification and request medical clearance regarding fitness to work. These will be advised to you as part of the process.
- For people being employed by Finance Ireland Credit Solutions DAC, additional personal information is required to facilitate employment, compliance and payment services, such as bank account details, national identification numbers and visa details. This data will only be held for as long as it is required to provide such employment services and will be deleted 7 years after your employment has finished and data is not required for any other legal purposes.
- This list is not exhaustive and we may seek to process, use or disclose your information for other purposes which have not been listed above and where this occurs we will inform you.

Covid-19 Coronavirus

During the pandemic, our preference is to hold interviews by video conference. Should you be asked to attend our offices, we will ask you to complete a Covid-19 symptom Visitor Self Declaration form in advance of entering our offices. The company is collecting this sensitive personal data for the purposes of maintaining safety within the workplace in light of the COVID-19 pandemic. You will be asked for your address and phone number for the purposes of Covid-19 contact tracing. The legal basis for collecting this data is based on vital interests and maintaining occupational health and will be held securely in line with our retention policy.

How do we use your information?

The information we hold and process will be used for management and administrative purposes associated with the recruitment process. We keep it and use it to enable us to run our business, manage our relationship with you effectively, lawfully and appropriately and protect applicant rights and interests. This includes using your information to enable us to manage the employment contract if recruited, to comply with legal obligations, pursue our legitimate interests and protect our legal position in the event of legal proceedings against the company.

The uses we make of each category of your personal data, together with the legal bases we rely on for those uses are set out in more detail in the appendix to this notice. Where there is a need to process your data for a purpose other than those set out in the appendix or otherwise outlined to you, we will inform you of this as appropriate.

How is your information shared?

We hold recruitment data on our Applicant tracking system and in email correspondence with you. Your information may be disclosed to third parties where we are legally obliged to do so.

We reserve the right to assign your data to a third party in the event of a sale, merger, liquidation, receivership or transfer of all the assets of our company in circumstances.

More detailed information on how we share your personal data is set out in the appendix.

Will your information be transferred abroad?

We may transfer your personal data to other companies within our group, to a country or territory outside the Irish state, EU and EEA for purposes connected with the management of the company's business.

In limited and necessary circumstances, your personal data may be transferred outside of the EEA. We are committed to ensuring the security of your personal data where it is transferred outside of the EEA. *[We will use approved transfer mechanisms and password protect documents where appropriate in respect of such data transfers and will seek advice on the transferring of data outside of the EEA if appropriate.]*

How long do we keep your information?

Any personal data processed about you is retained only for as long as it is required and in the case of unsuccessful candidates will be deleted after one year.

What happens if you do not provide us with your information?

In some cases, you may decline to provide us with your personal data. However, if we believe that we require relevant information to effectively and properly manage our recruitment process, we may not be able to consider your application for a role if you decline to provide us with that personal data.

Will you be subject to profiling or automated decision making?

You will not be subject to automated decision making or profiling at this time.

What about existing Recruitment Data Information with Finance Ireland?

We will use our best endeavours to ensure that all Personal Data that you have submitted to us is maintained and up to date. However, it is your responsibility to inform us of any changes to your Personal Data.

Where we currently hold personal information about you, you may at any time request that we modify, update, erase or provide a copy of this information to you by emailing privacy@financeireland.com from the email address of record and these will be actioned and you will receive confirmation that this has been completed. We may refuse your request where we are legally obliged to do so or where the deletion inhibits the full consideration of all facts related to your candidacy for a role. Where your request has been refused we will provide you with reasons for this refusal. We will then hold such data for only as long as it is necessarily required by law.

What are your rights under data protection law?

You have the following rights under data protection law, although your ability to exercise these rights may be subject to certain conditions:

- the right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data;
- the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete;
- the right, in certain circumstances, to request that we erase your personal data;
- the right, in certain circumstances, to request that we no longer process your personal data for particular purposes, or object to our use of your personal data or the way in which we process it;
- the right, in certain circumstances, to transfer your personal data to another organisation;
- the right to object to automated decision making and/or profiling; and
- the right to complain to the Data Protection Commissioner - You have the right to lodge a complaint with the Data Protection Authority, in the Member State of your residence, place of work or place of alleged infringement, if you consider that the processing of your personal data infringes the GDPR.

Security of your Personal Information

We are committed to the protection of Personal Information submitted to us. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access,

use, or disclosure. While Finance Ireland Credit Solutions DAC takes all due care in ensuring the privacy and integrity of the information that you provide, we recognise that no data transmission over the Internet can be guaranteed to be 100% secure. The possibility exists that this information could be unlawfully observed by a third party while in transit over the Internet. Finance Ireland Credit Solutions DAC accepts no liability should this occur.

Further information

If you have any queries in relation to this data protection notice, or if you have any concerns as to how your data is processed, please contact privacy@financeireland.com

Review

This data protection notice will be reviewed from time to time to consider changes in the law and the experience of the notice in practice.

15th July 2020

APPENDIX

Category of data	Elements of data	Purpose for processing and uses of the data	Legal basis for processing the data	Categories of recipients
Recruitment related data	<p>Personal data collected as part of the recruitment process. The data may include contact details, date of birth, curriculum vitae, work and educational history, referee names, interview notes and related documentation.</p> <p>(This is not an exhaustive list)</p>	To complete the recruitment process and assess candidate suitability for the role.	<p>The processing is necessary for our legitimate interests in managing an effective recruitment process in circumstances where such interests are not overridden by the rights and freedoms of employees and to enter into a contract with the candidate if successful.</p> <p>Where the individual does not provide the requested data, Finance Ireland may be unable to consider their application for employment.</p>	<p>The information may be shared with organisations who provide services to the company, e.g. our Applicant Tracking System, our HR Management System, HR advisors, Legal advisors.</p> <p>We reserve the right to assign your data to a third party in the event of a sale, merger, liquidation, receivership or transfer of all the assets of our company in circumstances where the third party agrees to observe the terms of this Privacy Notice.</p>
Covid-19 related data	Address and phone number for Contact tracing, Health data	To comply with Covid-19	Legitimate interest/Legal Obligation	HSE