

# FCG Worldwide Limited

## RECRUITMENT PRIVACY NOTICE

Last Updated 15 May 2018

### 1 Scope of privacy notice

Like most businesses, we hold and process a wide range of information, some of which relates to individuals who are applying to work for us. This notice explains the type of information we process, why we are processing it and how that processing may affect you.

The notice focuses on individuals who are applying to work for us and the data we process as part of that process. We have a separate **Workplace Privacy Notice** that applies to our current and former employees.

This notice is set out in this document (the **Core Notice**) and **Annex 1: Supplementary Information**. We have also provided local information, which makes clear any differences in your particular jurisdiction. This can be found in **Annex 2**.

In the Supplementary Information, we explain what we mean by "personal data", "processing", "sensitive personal data" and other terms used in the notice.

In brief, this notice explains:

- what personal data we hold and why we process it;
- the legal grounds which allow us to process your personal data;
- where the data comes from, who gets to see it and how long we keep it;
- how to access your personal data and other rights;
- how to contact us.

This policy applies to individuals applying to work for all group companies that are part of Four, and within this policy "we", "us", "our", or "**Four**" all refer to **all** companies relevant to your work at Four.

Four Communications Group Limited is the principal data controller, and is registered with the ICO under number Z3111083. Four Communications Group Limited is a UK company registered in England with registered company number 05114815 and whose registered office is at 20 St Thomas Street, London, SE1 9BF.

### 2 Personal data – what we hold and why we process it

We process data for the purposes of our business including recruitment, management, administrative, employment and legal purposes. The Supplementary Information provides more specific information on these purposes, on the type of data that may be processed and on the grounds on which we process data. See **Annex 1: Legal grounds for processing personal data** and **Annex 1: Further information on the data we process and our purposes**.

### 3 Where the data comes from and who gets to see it

Some of the personal data that we process about you comes from you. For example, you tell us your contact details and work history. If you are joining us, you may provide your banking details.

Other personal data may come from third parties such as recruiters acting on your behalf or from your references.

Your personal data will be seen internally by managers, HR and, in some circumstances (if you join us) colleagues. We will where necessary and as set out in this privacy notice also pass your data outside the organisation, for example to people you are dealing with and payroll agencies.

Further information on this is provided in **Annex 1: Where the data comes from and Annex 1: Who gets to see your data?**

### 4 How long do we keep your personal data?

We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes. In general, if you become employed by us we will keep your personal data for the duration of your employment and for a period afterwards. If you are unsuccessful in gaining employment with us, we will likely keep your personal data for a period after informing you that you were unsuccessful.

See **Annex 1: Retaining your personal data – more information.**

### 5 Transfers of personal data outside the EEA

We will where necessary and as set out in this privacy notice transfer your personal data outside the EEA to members of our group and processors in other jurisdictions in which we are established.

Further information on these transfers and the measures taken to safeguard your data are set out in **Annex 1: Transfers of personal data outside the EEA – more information.**

A list of data recipients who receive material amounts of personal data and are located outside of the EEA is set out in **Annex 3: Extra-EEA Third Party Processors.**

### 6 Your data rights

You have a right to make a subject access request to receive information about the data that we process about you. Further information on this and on other rights is in **Annex 1: Access to your personal data and other rights.** We also explain how to make a complaint about our processing of your data.

## **7 Contact details**

In processing your personal data, we act as a data controller. Our contact details are set out in **Annex 2**.

Please note that generally the data controller of your personal data will be your employing/engaging entity (or the employing/engaging entity that you apply to work for) but also group companies within Four with which we share data for business administration purposes.

## **8 Status of this notice**

This notice does not form part of any contract of employment you might enter into and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this notice is intended to create an employment relationship between Four and any non-employee.

## Annex 1

### Supplementary information

#### 1 What do we mean by “personal data” and “processing”?

“Personal data” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

Data “processed automatically” includes information held on, or relating to use of, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV or photographs.

“Processing” means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “sensitive personal data”.

References in this notice to employment, work (and similar expressions) include any arrangement we may have under which an individual provides us with work or services, or applies for such work or services. By way of example, when we mention an “employment contract”, that includes a contract under which you provide us with services; when we refer to ending your potential employment, that includes terminating a contract for services. We use the word “you” to refer to anyone within the scope of the notice.

#### 2 Legal grounds for processing personal data

##### 2.1 What are the grounds for processing?

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as **Contract**, **Legal obligation**, **Legitimate Interests** and **Consent** and outline what those terms mean in the following table.

Term	Ground for processing	Explanation
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.

Term	Ground for processing	Explanation
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	<p>We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data.</p> <p>Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.</p>
Consent	You have given specific consent to processing your data	In general processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as provide a reference and rely on your consent to our doing so.

## 2.2 Processing sensitive personal data

If we process sensitive personal data about you (for example (but without limitation), storing your health records to assist us in ensuring that we provide you with a healthy and safe work workplace or processing personal data relating to diversity monitoring), as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include:

- Processing being necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
- Processing relating to data about you that you have made public (e.g. if you tell colleagues that you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity;
- Processing for equality and diversity purposes to the extent permitted by law.

## 2.3 Further information on the data we process and our purposes

The Core Notice outlines the purposes for which we process your personal data. More specific information on these, examples of the data and the grounds on which we process data are in the table below.

The examples in the table cannot, of course, be exhaustive. For example, although the table does not mention data relating to criminal offences, if we were to find out that someone applying to work for us was suspected of committing a criminal offence, we might process that information if relevant for our purposes. If necessary we will also require criminal background checks for certain roles – for example those working in financial roles or with minors.

Purpose	Examples of personal data that may be processed	Grounds for processing
Recruitment	<p>Standard data related to your identity (e.g. your name, address, email address, ID information and documents, telephone numbers, place of birth, nationality, contact details, professional experience and education (including university degrees, academic records, professional licenses, memberships and certifications, awards and achievements, and current and previous employment details), financial information (including current salary information) language skills, and any other personal data that you present us with as part of your application related to the fulfilment of the role.</p> <p>Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or background checks and any information connected with your right to work.</p> <p>If necessary, we will also process information concerning your health, any disability and in connection with any adjustments to working arrangements.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>
Administering our recruitment process	<p>Evaluating your experience and qualifications against the requirements of the position you are applying for.</p> <p>Administering our online careers portal.</p> <p>Communicating with you in respect of any offer of employment we choose to make and providing you with information about our onboarding process.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>
Entering into a contract with you (if you are made an offer by us)	<p>Information on your terms of employment from time to time including your hours and working patterns, your pay and benefits, such as your participation in pension arrangements, life and medical insurance; and any bonus or share schemes.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>

Purpose	Examples of personal data that may be processed	Grounds for processing
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin.	Contract Legitimate interests
Payroll administration	Information on your bank account, pension contributions and on tax and national insurance  Your national insurance number or other government issued identifier.	Contract Legal obligation Legitimate interests
Financial planning and budgeting	Information such as your proposed salary and (if applicable) envisaged bonus levels.	Legitimate interests
Physical and system security	CCTV images upon attendance for interview at our premises.	Legal obligation Legitimate interests
Providing information to third parties in connection with transactions that we contemplate or carry out	Information on any offer made to you and your proposed contract and other employment data that may be required by a party to a transaction such as a prospective purchaser, seller or outsourcer.	Legitimate interests
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age as part of diversity monitoring initiatives. Such data will be aggregated and used for equality of opportunity monitoring purposes. Please note we may share aggregated and anonymized diversity statistics with regulators if formally required / requested.	Legitimate interests
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting us.	Legitimate interests Legal obligation

Please note that if you accept an offer from us the business will process further information as part of the employment relationship. We will provide you with our full **Workplace Privacy Notice** as part of the on-boarding process.

### 3 Where the data comes from

When you apply to work for us the initial data about you that we process is likely to come from you: for example, contact details, bank details and information on your immigration status and whether you can lawfully work. Where necessary and in accordance with this privacy notice, we will require references and information to carry out background checks. If you have concerns about this in a particular context, you should speak to your recruiter or our HR department.

Please note we may also receive data from third party recruiters, agents and similar organisations as a part of the recruitment process.

### 4 Who gets to see your data?

#### 4.1 Internal use

Where necessary and as set out in this privacy notice, your personal data will be disclosed to relevant managers, HR and administrators for the purposes of your application as mentioned in this document. We will also disclose this to other members of our group where necessary for decision making regarding your application – this will depend on the type of role you are applying for.

#### 4.2 External use

We will only disclose your personal data outside the group if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.

We will disclose your data if it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-ridden by your interests and rights in particular to privacy). Where necessary, we will also disclose your personal data if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.

Specific circumstances in which your personal data may be disclosed include:

- Disclosure to organisations that process data on our behalf such as our payroll service, insurers and other benefit providers, our bank and organisations that host our IT systems and data. This would normally occur if you accept an offer from us and would be carried out as part of the on-boarding process;
- To third party recruitment consultants and similar businesses (including online recruitment portals) as a part of the recruitment process;
- Disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request (see above).

## 5 Retaining your personal data – more information

Although there is no specific period for which we will keep your personal data, we will not keep it for longer than is necessary for our purposes. In general if you are successful in becoming employed by us, we will keep your personal data for the duration of your employment and for a period afterwards.

If you are unsuccessful in gaining employment with us, we will likely keep your personal data for a short period after informing you that you were unsuccessful. In considering how long to keep your data, we will take into account its relevance to our business and your potential employment either as a record or in the event of a legal claim.

If your data is only useful for a short period (for example, CCTV footage data) we will delete it normally within 30 days.

Personal data relating to job applicants (other than the person who is successful) will normally be deleted after 24 months.

## 6 Transfers of personal data outside the EEA – more information

In connection with our business and for employment, administrative, management and legal purposes, we will where necessary and as set out in this privacy notice transfer your personal data outside the EEA to members of our group and data processors in other jurisdictions in which we are established. We will ensure that any transfer is lawful and that there are appropriate security arrangements.

In relation to intra-group transfers, the members of the Four group of companies we have entered into agreements ensuring appropriate and suitable safeguards with Four controllers/processors outside the EEA. These are in standard terms approved by the European Commission. If you wish to see details of these safeguards, please ask the Data Protection team.

A list of data recipients who receive material amounts of personal data and are located outside of the EEA is set out in **Annex 3: Extra-EEA Third Party Processors**.

## 7 Access to your personal data and other rights

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

You also have a legal right to make a "subject access request". If you exercise this right and we hold personal data about you, we are required to provide you with information on it, including:

- Giving you a description and copy of the personal data
- Telling you why we are processing it

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is Consent or Contract.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

## **8 Complaints**

If you have complaints relating to our processing of your personal data, you should raise these with HR in the first instance or with our Data Protection team. You may also raise complaints with your statutory regulator. For contact and other details please contact our HR team.

## **9 Status of this notice**

This notice does not form part of any contract of employment that you may enter into with us and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this notice is intended to create an employment relationship between Four and any non-employee.

## Annex 2

### Information specific to Jurisdictions

#### United Kingdom

If you are employed, engaged or otherwise in the UK the following additional information applies.

The statutory regulator is the ICO.

Data controller	Address
FCG Worldwide Limited	20 St Thomas Street, London, SE1 9BF, UK
Four Communications Group Limited	20 St Thomas Street, London, SE1 9BF, UK
Four Communications Limited	20 St Thomas Street, London, SE1 9BF, UK
Four Marketing & Media Limited	20 St Thomas Street, London, SE1 9BF, UK
Four Colman Getty Limited	20 St Thomas Street, London, SE1 9BF, UK
Consolidated PR Limited	20 St Thomas Street, London, SE1 9BF, UK
Four MSA Limited	20 St Thomas Street, London, SE1 9BF, UK
Four Broadgate Mainland Limited	20 St Thomas Street, London, SE1 9BF, UK
Four Cymru FBA Limited	4 Science Park, Aberystwyth, SY23 3AH, UK
Four Health Communications Limited	20 St Thomas Street, London, SE1 9BF, UK
Four Rain Limited	20 St Thomas Street, London, SE1 9BF, UK
Legend Engage Limited	20 St Thomas Street, London, SE1 9BF, UK

Data protection contact	Company	E-mail address
Data Protection team	Four Communications Group Limited	<a href="mailto:dataprotection@fourcommunications.com">dataprotection@fourcommunications.com</a>

Please note that this Privacy Notice, along with other related Four policies and/or protocols, shall form Four's policy for procuring special data as required by the UK Data Protection Bill 2018 (Schedule 1 Part IV).

## Annex 3

### Extra-EEA Third party processors

As indicated above, we may transfer your personal data outside the EEA in countries which do not have data protection laws equivalent to those applicable in the EEA. This transfer is covered by model clauses approved by the European Commission.

The transfer of personal data to recipients based outside of the EEA is carried out to assist us with the processing of payroll and other HR functions.

List of data recipients located outside the EU:

Recipients	Country
As at the date this notice was last updated, no transfers to non-EEA countries take place.	