



JOB APPLICANT PRIVACY NOTICE

Data Controller: Firefish Ltd

Data Protection Officer: dataprotection@firefish.ltd.uk

Firefish Ltd refers to a group of companies consisting of Firefish, The Numbers Lab, The Pineapple Lounge and Firefish USA. For the purposes of this document The Firefish Group refers to Firefish, The Numbers Lab and The Pineapple Lounge.

As part of any recruitment process, The Firefish Group collects and processes personal data relating to job applicants. The Firefish Group is committed to being transparent about how we collect and use this data and meet our data protection obligations.

What personal data does The Firefish Group collect?

The Firefish Group collects a range of your personal data. This includes:

- Your name, address and contact details, including email address and telephone number
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration, including benefit entitlements
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK

The Firefish Group may collect personal data in a variety of ways. For example, it might be contained in application forms, CVs or covering letters, collected through interviews or other forms of assessment, including pre task presentations or obtained from your passport or other identity documents.

The Firefish Group will collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records and credit history checks. The Firefish Group will collect personal data from third parties only once a job offer to you has been made and will inform you that it is doing so.

Personal data will be stored in a range of different places, including in your employee file, our HR management systems and in other IT systems (including temporarily in our email system).

Why does The Firefish Group process personal data?

The Firefish Group needs to process personal data to take steps at your request prior to entering into a contract with you.

In some cases, The Firefish Group needs to process personal data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

Version 1_May 2018

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The Firefish Group has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing personal data from job applicants allows The Firefish Group to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

The Firefish Group may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability.

The Firefish Group performs criminal record and credit history checks when on-boarding successful applicants for permanent positions. Where The Firefish Group seeks this information, we do so because it is necessary for us to carry out our contractual obligations and exercise specific rights in relation to employment.

The Firefish Group will not use your personal data for any purpose other than the recruitment exercise for which you have applied.

Where do we get your personal data from?

The Firefish Group may receive your personal data from a third party recruiter/HR Consultancy who run/aid the recruitment process. Occasionally The Firefish Group or the third party recruiter/HR Company may obtain your personal data from publicly accessible sources e.g. LinkedIn.

Who has access to your personal data?

Relevant aspects of your personal data is shared internally with relevant individuals, which may include managers involved in the recruitment process, managers in the business area with a vacancy, the Operations managers, members of the Finance team, and IT staff if access to your data is necessary for performance of their roles.

Firefish Ltd will not share your personal data with any other third parties except those stated above, unless your application for employment is successful and it makes you an offer of employment. The Firefish Group will then share your personal data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Your personal data may be transferred to countries outside the European Economic Area (EEA) for the purpose of processing payroll, the provision of benefits and the provision of occupational health services. Data is transferred outside the EEA on the basis of relevant safeguards e.g. declaration of adequacy, standard contractual clauses or binding corporate rules.

How does The Firefish Group protect personal data?

The Firefish Group takes the security of your personal data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

- Only authorised people have access to your personal data
- Your personal data is stored on secure servers hosted by us or third parties providing hosting services for us/is encrypted when stored to prevent unauthorised access or loss
- Secure transfer methods are used so your personal data is safe whenever it is shared



- Secure destruction methods are used when we dispose of your personal data
- Physical documents containing your personal data are kept under lock and key in filing cabinets in a restricted access area

Where The Firefish Group engages third parties to process personal data they are obliged to do so on the basis of written instructions, under a duty of confidentiality and they take appropriate security measures.

For how long does The Firefish Group keep personal data?

If your application for employment is unsuccessful, The Firefish Group will delete your personal data after the end of the relevant recruitment process.

If your application for employment is successful, personal data gathered during the recruitment process, including your CV, will be transferred to your employee file and retained during your employment. The periods for which your personal data will be held will be provided to you in a new privacy policy, details of which can be found in the Handbook.

Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your personal data on request
- Require the Firefish Group to change incorrect or incomplete data
- Require the Firefish Group to delete or stop processing your personal data, for example where it is no longer necessary for the purposes of processing
- Object to the processing of your personal data where the Firefish Group is relying on its legitimate interests as the legal ground for processing

If you would like to exercise any of these rights, please contact our DPO at dataprotection@firefish.ltd.uk

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner. Contact details can be found at <https://ico.org.uk>

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

Automated decision-making

Recruitment processes are not based solely on automated decision-making.

About Us

Firefish Ltd is an independent market research agency incorporated in England and Wales with a company registration of 03854900 and located at 170-172 Tower Bridge Road, London, SE1 3LS, U.K.



Updates to Privacy Policy

This policy may be updated from time to time and you should always check that you are referring to the most recent version.

Policy effective date: 25th May, 2018

Policy version: V1_2018