

Candidate Privacy Notice

Version 1.2, June 2023

1. What is the purpose of this document?

This notice sets out how Spire Management Limited ("Spire", "we", "us", or "our") uses the personal data we may hold about you in connection with recruitment, including where you apply to work with us (whether as an employee, worker or contractor), and your rights in relation to this. The laws that may apply to our handling of your personal data are: (i) the United Kingdom General Data Protection Regulation; (ii) the Data Protection Act 2018; (iii) the EU General Data Protection Regulation 2016; (iv) the Privacy and Electronic Communications (EC Directive) Regulations 2003; and (v) all similar or related legislation relating to the processing of personal data and/or privacy applicable to Spire from time to time or as re-enacted, applied, amended, superseded, repealed or consolidated (together the "Data Protection Legislation").

This policy should be read in conjunction with our general [Privacy Policy](#), which contains information on who the data controller is in respect of your personal data, how your personal data may be shared with third parties who are located outside the UK or the European Economic Area (as applicable), data security, data retention and your rights in relation to the personal data we hold about you, together with information about the cookies which we use on our website.

2. Data protection principles

We will comply with Data Protection Legislation, 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 for as long as is necessary for the purposes we have told you about; and
- Kept securely.

3. Information about you

The kind of information we hold about you

We will hold and process personal data relevant to recruitment, which may include:

- The information you have provided to us in your curriculum vitae and covering letter, including identity information, contact information, work history, qualifications and certifications;
- Any information you provide to us or that we produce during an interview and any test results;
- Information relating to equal opportunity monitoring and reporting, including information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your compensation, including your basic salary, benefits, bonuses;
- Evidence of your right to work and nationality (e.g. information from your passport and driving licence, and your National Insurance number);
- Information about your health, including any medical condition, health and sickness records; and
- Results from pre-employment screening checks (e.g. credit history, criminal records checks where permitted under local law).

How is your personal information collected?

We collect personal data about candidates from the following sources:

- You, the candidate;
- Third parties including our partner recruitment agency(ies), your named referees, background check agencies and publicly available information.

How we will use information about you

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

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

The legal basis for processing your personal data relating to recruitment is because it is necessary: (i) for our legitimate interests in operating our business efficiently; (ii) for the performance of a contract or to take steps prior to entering into a contract; and/or (iii) to comply with our legal obligations. Where we process information which falls within "special categories", this is because it is necessary in connection with our legal or regulatory rights, obligations and requirements. In some instances we may rely on your express consent to use your personal data, but we will let you know (and give you the chance to withdraw consent) if we do.

Failing to provide personal information

If, when requested, you fail to provide information which is necessary for us to consider your application or otherwise in connection with our recruitment process (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.

Automated decision-making

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

4. Data sharing

Why might you share my personal data with third parties?

If, when requested, you fail to provide information which is necessary for us to consider your application or otherwise in connection with our recruitment

process (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.

5.Data retention

How long will you use my information for?

In addition to using your personal data for the position for which you have applied, we may retain and use your personal data to consider you for other positions. If you do not want to be considered for other positions or would like to have your personal data removed, you may contact us by emailing info@spirellp.com.

Please see our general [Privacy Policy](#) for further information on our retention of your personal data.

6.Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

You have the following rights under Data Protection Legislation:

- Right of access: You are entitled to ask us for copies of your personal data.
- Right to rectification: You are entitled to ask us to make any changes to ensure that any personal data we hold about you is accurate, complete and up to date.
- Right to erasure: You are entitled to ask us to erase or stop processing any personal data we hold about you in certain circumstances.
- Right to restriction of processing: You are entitled to ask us to restrict the processing of your personal data in certain circumstances.
- Right to object to processing: You are entitled to object to the processing of your personal data in certain circumstances.
- Right to data portability: You are entitled to ask that we transfer the personal data we hold about you to a specified third party, or to you, in certain circumstances.

Who to contact to exercise your rights or to make a complaint

If you wish to exercise any of the rights set out above, please contact us by email to info@spirellp.com. We may also contact you to ask you for further information in relation to your request to speed up our response.

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 (www.ico.org.uk), or any other applicable supervisory authority for data protection issues. We would appreciate the chance to deal with your concerns before you approach the applicable supervisory authority, so please do feel free to contact us in the first instance and we will try our best to address your concerns.

7.Changes to this policy

We keep this policy under regular review and may amend it at any time. Any changes to this policy will be posted on our website at www.spirellp.com.