

Findel Education Human Resource Fair Processing Notice

Findel Education Limited ("we", the "Company") engages a wide variety of people in many different roles. This includes employing individuals directly or as third-party contractors ("you" or "individual(s)"). This statement explains how we will use the personal information that you provide about yourself before, during and after your employment with Findel Education, and also information about you that we may gather about you from third parties.

What we can do with your personal information is governed by the Data Protection Act 1998, which is due to be amended or replaced on 25th May 2018 to accommodate the implementation of the EU Regulation 2016/679 commonly known as the General Data Protection Regulation (GDPR) ("Data Protection Laws").

We are the data controller of your information under Data Protection Laws. This means that we will make decisions about you based upon the information that you have provided.

We have a Data Protection Officer ("DPO") who monitors our compliance with obligations under the Data Protection Laws and is the point of contact for individuals (job applicants, employees, customers etc) and the Information Commissioner's Office, who is our supervisory authority.

The Data Protection Officer
Findel Education Ltd
2 Gregory Street
Hyde
Cheshire
SK14 4TH

Email: DPO@findel-education.co.uk

If you have any questions about how we handle your personal information please contact the Data Protection Officer at the address above.

You have the right to object to the Company processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances. To do this, please contact the Data Protection Officer at the address above.

Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us so that we can locate and verify your personal information.

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk>.

Telephone calls may be recorded or monitored for training/monitoring & regulatory record keeping purposes.

What do we do with your personal information during the recruitment process?

We will use the information that you provide to us through your Curriculum Vitae or the application form ("CV") to assess your suitability for the role you have applied for within our Company.

As part of our recruitment process you will apply via our Applicant Tracking System "BlueOctopus" which will require you to input your personal information. This is a third-party cloud-based service based in the European Economic Area.

Any CVs that are received speculatively will be directed to apply via the BlueOctopus system.

Any CVs that are received from a nominated recruitment agency for a specific role will be held on file by the HR Department, as opposed to the BlueOctopus system.

There are no fully automated decisions made during the recruitment process.

We will invite a selection of applicants to an interview to assess in more detail the candidate(s) most suited to the role on offer.

If you are not selected for interview for the specific role you have applied for we will keep your CV in the BlueOctopus system for a further 6 months and will consider you for other roles within the Company, unless you tell us that you do not want us to use your personal information in this way. After this time, we will delete your personal information from our records.

If your CV has been received from one of our nominated recruitment agencies, we will keep your CV on file in the HR Department for 6 months and consider you for other roles within the Company, unless you tell us that you do not want us to use your personal information in this way. After this time, we will delete your personal information from our records.

We will also use the personal information supplied on the application form for Equal Opportunities monitoring.

What do we do with your personal information at the interview stage of the recruitment process?

We will use the information that you provide to us on your CV as part of the interview to verify your identity and assess your suitability for the role you have applied for within Findel Education Limited. The successful candidate(s) will be offered the role.

If you are not offered the specific role you have applied for we will keep your CV in the BlueOctopus system and your selection process information in the HR Department for a further 6 months for legal purposes. We will review your CV in BlueOctopus for the same period of time to consider you for other roles within the Company, unless you tell us that you do not want us to use your CV in this way. After this time, we will delete your personal information from our records.

What do we do with your personal information between your offer and you starting work with us?

If your application is successful, we will write to your nominated referees, to obtain up to two references about you, at least one of which should be a previous employer.

For certain roles we may need to carry out a DBS check and this will be discussed with you during the recruitment process. In order to do this, we use a third party, Atlantic Data, and we will share your personal information with them that you have supplied on your CV, as well as information in any additional documents that you would need to provide to enable us to carry out the check.

The result of the DBS check (the "Disclosure") will be sent to you directly by DBS. However, if anything of concern appears on your report we will receive notification that there may be areas of concern for us. If this is the case, we will ask that you supply us a copy of the Disclosure that you have received so that it can be assessed by a member of staff against our internal criteria depending upon the role applied for.

If you decide not to accept the role offered all the personal information and references received will be held by the HR Department for 6 months from the date you rejected the offer for legal purposes. We will hold your CV in BlueOctopus for the same period of time to consider you for other roles within the Company, unless you tell us that you do not want us to use your CV in this way. After this time, we will delete your personal information from our records.

If, as a result of the checks being carried out by Findel Education Ltd the offer of employment is withdrawn, all the personal information and references received will be held by Findel Education Limited for up to 12 months for legal reasons. We will hold your CV in BlueOctopus for 6 months to consider you for other roles within the Company, unless you tell us that you do not want us to use your CV in this way. After this time, we will delete your personal information from our records.

What do use your information for whilst you work for us?

We will use the personal information that you provide to us through your CV, the interview process and during your employment for:

- ▶ Payroll (for pay and benefits)
- ▶ Ongoing CRB/ DBS checks (for compliance and safeguarding)
- ▶ Contact purposes (including next of kin in the event of an emergency)
- ▶ Legal reporting purposes (for compliance and regulatory, legal reasons)
- ▶ Written correspondence (for contractual terms, changes and information)
- ▶ Monitor performance and attendance (for objective setting and individual development)
- ▶ Sickness records (for monitoring wellbeing and costs)
- ▶ Benefits administration, if applicable (for offers and terms & conditions)
- ▶ Training & Development administration (for providing training through various platforms)
- ▶ Performance management processes and succession planning
- ▶ Travel administration, if appropriate (for compliance and insurance purposes)
- ▶ Company car administration, if applicable (to monitor users of company assets and for H&S reasons)
- ▶ Insurance administration (to ensure life cover, health insurance and other required/statutory insurances are in place for compliance)
- ▶ Pension administration (to ensure we comply with the pension regulator)
- ▶ Compliance with company policies and procedures (for example absence and standards)
- ▶ Monitor diversity and equal opportunities (for example racial or religious information to ensure equal representation is monitored)

All personal information is stored securely on our compliant cloud-based HR System (ADP.Net). All your personal details are accessible to you through your unique and personal login via ESS (Employee Self-Service).

All payroll information is stored securely within our compliant local payroll system (Payrite) to ensure we comply with HMRC and pay employees as part of their terms and conditions of employment.

Once you join Findel Education Limited, depending on your job role, we may carry out periodic Disclosure and Baring Service (DBS) checks (see above for details), using the following third parties: Atlantic Data and the Government's own DBS Update Service.

As a result of the checks being carried out by Findel Education Limited, we may invoke the Company's disciplinary procedure which may result in disciplinary action up to and including dismissal.

Whilst you are an employee of Findel Education Limited we may share your information with:

- ▶ Other members of the Findel PLC Group for administration purposes,
- ▶ External professional advisors for legal and audit purposes,
- ▶ Occupational health advisors to ensure the employee is fit for work or workplace assessments, when appropriate.
- ▶ Our pension provider
- ▶ Our insurance provider(s)
- ▶ Our training provider(s)
- ▶ Our Performance Management provider (ClearReview)
- ▶ Our benefits provider(s)
- ▶ Our Fleet Management provider
- ▶ Our travel agent, where appropriate

If your role involves using the telephone system, then your calls may be recorded for training and monitoring purposes through our Avaya phone system(s).

For some sales related roles, we will use your home address to send you any relevant catalogues or promotional materials to enable you to carry out your job role effectively. Your home address will be shared with our nominated mailing house as part of this process.

CCTV cameras are used around all Findel Education sites. They are for the prevention and detection of crime, the prosecution of offenders and public safety.

From time to time, depending on your role, you may be asked to travel outside of the European Economic Area. If you are required to travel we will need to collect and share your passport information with our third-party travel agent, currently AMEX.

All your personal information will be held on file by Findel Education Limited in accordance with our Findel Education Data Retention Policy.

Staff account

If as a member of staff, you decide to open a staff account with the Express Gifts Division you will not be credit checked.

What do we do with your information when you no longer work for us?

All the personal information will be held on file by Findel Education Limited for up to 6 years from your last day of employment, unless otherwise required by legislation.