

HR Privacy Notice

Candidates

Respect

Excellence

Attention

Challenge

Honesty

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About us

Charter Court Financial Services is a trading name of Exact Mortgage Experts Limited which is part of the Charter Court Group. The Charter Court Group is made up of Charter Court Financial Services Group plc and its subsidiary companies Charter Court Financial Services Limited, Charter Mortgages Limited, Exact Mortgage Experts Limited and Broadlands Finance Limited.

Exact Mortgage Experts Limited will be a data controller of any personal data it holds about you and your enquiry about a role with us. We may share this information with other parts of the Charter Court Group. Where this occurs, they will be a separate data controller in respect of that personal data, and this privacy notice will also apply to any processing they undertake, unless they provide you with an alternative privacy notice.

A data controller is an individual or organisation which decides how your personal data will be used. The data controller is referred to as "we", "us" and "our" in this privacy notice.

If you require any further information or wish to contact us or our Data Protection Officer at any time our contact details are:

Address: Charter Court Financial Services
2 Charter Court
Broadlands
Wolverhampton
WV10 6TD

Telephone Number: 0333 014 3477

DPO Email: thedataprotectionofficer@chartercourtfsc.co.uk

Who this privacy notice applies to

This privacy notice explains how we will use the personal data of potential:

- employees;
- temporary workers;
- contractors, and
- directors.

Each such person is referred to as "you" and "your" in this privacy notice.

There is a separate privacy notice for employees, temporary workers and contractors.

Why we are providing you with this privacy notice

Applicable Data Protection laws (including the General Data Protection Regulation 2016 and the Data Protection Act 2018), impose obligations on us as the data controller, when we collect or create, hold, amend, disclose, share or otherwise use or erase/destroy (collectively referred to as processing) your personal data and give you, as the data subject, rights over your personal data.

One such obligation is to process, (e.g. collect, hold, use or erase) your personal data, fairly, lawfully and in a transparent manner. This privacy notice meets that obligation by explaining what personal data we will hold about you, how we will process your personal data, why we process your personal data and the lawful grounds on which we are processing it. It also sets out some of your legal rights.

We may change this privacy notice in the future. If we make any substantial and/or material changes and those changes materially affect you, we will inform you of any changes before they take effect.

This privacy notice does not form part of any contract of employment or other contract to provide services.

How we obtain your personal data

We will receive personal data about you from you, either directly or through an employment agency. This will be from CVs and other documents provided to us.

We will also receive data from other sources including employment agencies, persons working on our behalf and providing us services, other companies in the Charter Court Group and data that is publicly available, such as from the internet.

The types of personal data we will have about you

Personal data

We may process a wide variety of data about you, where necessary, for the purposes set out in the "How We Will Use Your Data" section, including data about:

you as an individual	<ul style="list-style-type: none"> • name, title and address • other contact details including email addresses and telephone numbers • criminal record
your employment and previous employment	<ul style="list-style-type: none"> • employment or work history with previous employers including employment status, length of employment or engagement (start and end dates), reason for leaving • the terms and conditions of your employment or your engagement • pay and benefits
your correspondence and documents we hold	<ul style="list-style-type: none"> • documents we hold, correspondence or communications received or sent and the information contained within them

Special category data

Some personal data for example data about your health, racial or ethnic origin is subject to additional rights and are described as special category data. The special category data which we may have about you is:

medical data	<ul style="list-style-type: none"> • disability data to enable us to make reasonable adjustments
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We will only process special category data if you have confirmed your consent to us doing so, or where we are legally permitted or required to process this information without seeking your consent. Where we have obtained your consent to us processing special category data in this way, you are entitled to withdraw your consent to this at any time. Please contact us if you wish to do so. If you withdraw your consent and we are not otherwise legally permitted to process such data, we will not continue to process this information for those purposes, but it will not impact the validity of any processing undertaken before you withdrew your consent.

We do not need your consent if we use special category data in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law.

How we will use your data

We will use your personal data to:

consider your application	<p>this will include to:</p> <ul style="list-style-type: none"> • communicate with you and any employment agency • assess your suitability to work for us • conduct assessments and interviews • make offers of employment or work • maintain a library of correspondence
identify and prevent financial crime	<p>this will include to:</p> <ul style="list-style-type: none"> • detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption and other crime

manage, run and develop our business	<p>this will include to:</p> <ul style="list-style-type: none"> • meet our legal contractual and regulatory obligations • prepare reports and undertake analysis • manage risk to us, you, our suppliers, shareholders, customers and clients • manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties including accounting and auditing • seek advice from our advisers • investigate and respond to complaints, disputes and where necessary to bring or defend legal claims
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Call recording

We will record and/or monitor telephone calls for the following purposes:

- for security, quality and/or training purposes;
- to confirm that you have complied with our instructions and training;
- to resolve or investigate any complaints, queries or concerns;
- to comply with our legal obligations, and
- to prevent fraud or other criminal activities.

The legal grounds on which we will process your data

We will only process your personal data if we have a reason to do so that is legally permitted. When using your personal data for the purposes listed above we are relying on one or more of the following legal reasons for processing that data:

- the purpose is necessary for the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you;
- the purpose is necessary for us to comply with our legal obligations;
- the purpose is necessary for our legitimate interests, or
- if you have consented to us processing personal data for one or more specified purposes.

The legitimate interests we have for processing your personal data as described above include to:

- comply with our legal and contractual obligations, best practice, internal policies and codes of practice;
- exercise our legal rights;
- verify the information provided to us to ensure its accuracy;
- manage and develop the benefits we provide to our workforce;
- develop and improve our business;
- ensure we have sufficient information to consider any application for employment or work;
- ensure that our employees, temporary workers and contractors meet and continue to meet the standards, values, ethics and behaviours we expect;
- manage and reduce risks to you, our business, suppliers, shareholders, customers and clients;
- prevent crime including financial crime and money laundering;
- prevent unauthorised access or use of our premises, IT, systems and resources;
- undertake analysis, modelling, and forecasting;
- keep our records up to date;
- be efficient in running our business, providing our products and services, fulfilling our legal obligations and meeting expectations of us;
- train and develop our employees and other people who work with us;
- ensure our business is profitable and has adequate levels of capital and funding, or
- facilitate investment in, and the growth of, our business.

Any special category data will only be processed where it is lawful to do so and shall potentially include processing:

- with your prior explicit consent;
- where permitted by law to protect your well-being;
- to prevent or detect unlawful acts;
- for the protection of the public, or
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Any personal data on criminal convictions will only be processed where it is lawful to do so and shall potentially include processing:

- prevent fraud;
- to comply with our legal obligations under anti Money Laundering and Financial Sanctions Legislation;
- decide whether to offer or terminate your employment or engagement with us, or
- notify the PRA and FCA in circumstances we believe there has been a breach of Conduct Rules or your role falls under the Senior Managers and Certification Regime and that amounts to a material change to fitness and propriety.

Who we share your data with

Your data may be shared internally, with other companies within the Charter Court Group and with employment agencies, agents and suppliers who act on our behalf and any other person you ask us to provide information to.

How long we will hold your data for

We will usually keep your personal data until six months from the date of your enquiry about a vacancy or potential vacancy. We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations, for research or statistical purposes or technical reasons.

If you choose not to give us personal data

We will not be able to consider you as a candidate for a role with us.

Your legal rights

You have a number of rights over your personal data processed by us. These include your rights to request:

- **access to your personal data.** You may request a copy of the personal data that we hold about you.
- **accuracy of your personal data.** You may request that we correct incomplete, inaccurate or outdated personal data. We take sensible steps to make sure that personal data is accurate, complete, and current. You can help us do this by notifying us of any changes to your personal data.
- **transmission of personal data.** You may request that we transfer personal data you have provided to us to you or to another person.
- **erasure of personal data.** You may request that we delete your personal data.
- **that the processing of your personal data be restricted.** You may request that our use of your personal data ends, is restricted or limited.
- **the withdrawal of your consent.** In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

The extent of these rights are limited by law and we may not act on part or all of your request(s) where the right(s) are not applicable. If we do not act on your request we will explain our reasons for not doing so when responding to your request.

If you require any further information about how we handle your personal data or if you wish to make a request to exercise any of your rights under applicable Data Protection Laws, please contact our Data Protection Officer.

How to complain

If you are unhappy with the outcome of any of your requests to exercise your rights, or how we handle your personal data then please let us know.

You are also entitled to complain with the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: Casework@ico.org.uk

Tel: 0303 123 1113