

## **Privacy Notice for Job Applicants**

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation.

Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

### **Who collects the information?**

Scottish Investment Services Limited is a wholly owned subsidiary of the Scottish National Investment Bank p.l.c. (the Bank) and was formerly called Scottish Investments (Advisory) Limited. Scottish Investment Services Limited, the Bank and any other group company (together described within this Privacy Notice using "we", "us" and "our") is / will be a "data controller" and gathers and uses certain information about you.

Information may also be collected in relation to you by third party recruitments partners working on our behalf. We use Experian to carry our adverse financial checks, reference checks and qualifications checks for us.

### **Data protection principles**

We will comply with the data protection principles when gathering and using personal information.

### **About the information we collect and hold**

The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e., before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

### **Where information may be held**

Information may be held at our offices, any group company offices and third-party agencies, service providers, representatives and agents as described below.

### **How long we keep your information.**

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed.

How long we keep your information will depend on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the time limits for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

### **Your rights to correct and access your information and to ask for it to be erased.**

Please contact our nominated Data Protection Officer (DPO) who can be contacted at [dataprotection@thebank.scot](mailto:dataprotection@thebank.scot) if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our nominated Data Protection Officer for some but not all of the information we hold and process to be erased (the "right to be forgotten") in certain circumstances. Our nominated Data Protection Officer will provide you with further information about the right to be forgotten, if you ask for it.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **How to complain**

If you have any queries or concerns about this notice or about our use of your personal information, please contact our nominated Data Protection Officer at [dataprotection@thebank.scot](mailto:dataprotection@thebank.scot). If our Data Protection Officer is not able to address your query or concern, you can contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

## **The Schedule**

### **About the information we collect and hold**

**Part A: Up to and including the shortlisting stage.**

<b>The information we collect</b>	<b>How we collect the information</b>	<b>Why we collect the information (legal basis)</b>	<b>How we use and may share the information</b>
<b>Your name, details of your qualifications, experience, employment history (may include job titles, salary and working hours) and interests</b>	Via third party recruitment partner. From you, in the interview notes (if relevant)	To perform a contract or take steps at your request, before entering into a contract	To make an informed recruitment decision

**Part B: Before making a final decision to recruit.**

<b>The information we collect</b>	<b>How we collect the information</b>	<b>Why we collect the information</b>	<b>How we use and may share the information</b>
<b>Your personal contact details (address, telephone numbers and email address) and details of your referees</b>	Via third party recruitment partner or direct from you	To perform a contract or take steps at your request, before entering into a contract  Once regulatory requirements apply to us, to comply with our legal obligations to obtain regulatory references	To carry out a fair recruitment process  To comply with legal/regulatory obligations  Information shared with relevant managers, HR personnel and the referee
<b>Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers</b>	From your referees, via Experian our 3 <sup>rd</sup> party screening provider	To perform a contract or take steps at your request, before entering into a contract  Once regulatory requirements apply to us, to comply with our legal obligations.	To obtain the relevant reference about you  To comply with legal/regulatory obligations  Information shared with relevant managers and HR personnel
<b>Information regarding your academic and professional qualifications</b>	From you, from your education provider, from the relevant professional body via Experian our 3 <sup>rd</sup> party screening provider	To perform a contract or take steps at your request, before entering into a contract	To make an informed recruitment decision  Information shared with relevant managers and HR personnel
<b>Information regarding your criminal record</b>	From you and from Disclosure Scotland or the Disclosure and Barring Service (DBS)	To perform a contract or take steps at your request, before entering into a contract	To make an informed recruitment decision  To carry out statutory checks

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		<p>For performing or exercising obligations or rights imposed or conferred by law on us in connection with employment.</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)</p>	<p>Information shared with Disclosure Scotland, the DBS and other regulatory authorities as required.</p> <p>Information shared with relevant managers and HR personnel</p>
<p><b>Your outside business interests and those of your immediate family including ownership of businesses, shareholdings, directorships or business partnerships</b></p>	<p>From you on the completed declaration of interests form</p>	<p>To perform a contract or take steps at your request, before entering into a contract</p>	<p>Information shared with relevant managers and HR personnel</p>
<p><b>Your personal or business relationships and those of your immediate family which could lead to a potential conflict of interest with the Scottish Investment Services Limited or the Bank or any group company</b></p>	<p>From you on the completed declaration of interests form</p>	<p>To perform a contract or take steps at your request, before entering into a contract</p>	<p>Information shared with relevant managers and HR personnel</p>
<p><b>Details of adverse financial history including if you have been declared bankrupt, been sequestrated or entered into any other arrangement for the benefit or your creditors, been subject to adverse findings by the Financial Conduct Authority (FCA) or other regulators or</b></p>	<p>From you on the completed declaration of interests form and through third party referencing agencies</p>	<p>To perform a contract or take steps at your request, before entering into a contract</p>	<p>Information shared with relevant managers and HR personnel</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
been disqualified as a company director.			
<b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information</b>	From you and, where necessary, the Home Office	To perform a contract or take steps at your request, before entering into a contract  To comply with our legal obligations	To carry out right to work checks.  Information may be shared with the Home Office

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