

1. Introduction and Scope

Davies Group Limited with its registered office at 5th Floor, 20 Gracechurch Street, London, EC3V 0BG, United Kingdom, and its entities and subsidiaries (hereinafter referred to as 'Davies Group') is committed to being transparent about how it processes your personal data.

This Privacy Policy has been created to outline how we will collect, hold, process, and share your personal data throughout the recruitment and selection process.

This Privacy Policy applies to Davies Group entities, including all regulated entities, in the following territories:

Territory	In Scope
UK	✓
Europe	✓

In this Privacy Policy, the terms 'we', 'our' or 'us' are used to refer to Davies Group, who are the data controller responsible for processing your personal data.

2. What Personal Data We Collect

We may collect and process a range of information about you in the course of the recruitment and selection process. This may include your:

- Name, address, contact details (including email address and mobile / telephone numbers), date of birth, marital status and gender.
- Recruitment information, including copies of your right to work documentation, references and other information included in your CV, cover letter or application form as part of the application process.
- Employment records, including job titles, work history, previous salary information, leave date and reason for leaving, working hours, holidays, training records and professional memberships.
- Records of your communication with us during the recruitment and selection process, including emails you send to our Recruitment Team.
- A recording of your interview(s), if carried out remotely via Microsoft Teams, or any other online platform.
- CCTV footage if you visit one of our offices in person.
- Records relating to any pre-employment checks we conduct for you, such as credit and/or criminal record checks.
- Psychometric testing data.
- Where the role you have applied for is subject to the Senior Manager & Certification Regime (SM&CR), credit, criminal record and regulatory reference checks will be carried out for all Senior Managers and Certified Persons. This will also apply to Davies Group employees who move into a role which falls under the SM&CR.
- Start date and, if different, the date of your continuous employment.

Davies Group may also collect, store, and use the following ‘special categories’ of personal data about you:

- Information about your medical or health conditions, including whether or not you have a disability or other underlying conditions for which Davies Group needs to make reasonable adjustments.
- Information about your health, including any medical condition, health or sickness records.
- Information about your criminal convictions and / or offences.
- Information relating to your race or ethnic origin, sexual life and orientation, or your religious / philosophical / moral beliefs, where this information is needed to facilitate equal opportunities monitoring.

3. Our Purposes for Processing Your Personal Data

Davies Group needs to process your personal data to assess your suitability for a role as part of the recruitment and selection process, as well as to take steps to enter into a contract of employment with you.

In some cases, we may need to process your personal data to ensure that we are complying with our legal obligations. For example, to:

- Verify your entitlement to work.
- Carry out criminal record or other background checks to ensure that you are permitted to undertake the role for which you have applied. We will only collect information relating to criminal convictions where we are legally permitted to do so, however if you refuse to provide any information when requested, we may be unable to recruit you.
- Ensure that we comply with our duties in relation to candidates with disabilities or underlying conditions who require reasonable adjustments, and to meet our obligations to you under health and safety law.
- Respond to and defend ourselves against legal claims.
- Ensure meaningful equal opportunities monitoring and reporting.

In other cases, Davies Group may have a legitimate interest to process your personal data, such as to ensure effective business management and planning, or to keep adequate records of the recruitment and selection process. Where Davies Group relies on its legitimate interests to process your personal data, we will ensure that those interests do not undermine your fundamental rights and freedoms as an individual.

4. Where We Collect Your Personal Data From

Davies Group collects your personal data in a variety of ways. For example, data is collected directly from you through:

- Application forms, CVs or resumes.
- Your passport or other identity documents such as your driving license.
- Forms completed by you as part of the recruitment and selection process.
- Correspondence and conversations we have with you.
- Information you enter into our systems as part of the recruitment and selection process.
- Interviews, meetings, and other assessments.

We may also request information about you from third parties, including (but not limited to):

- Recruitment companies.
- Background check providers.
- Former employers.
- Credit reference and other agencies, as part of the background checking process.

5. Who We Share Your Personal Data With

Your personal data will be shared internally within Davies Group with those colleagues who need it to carry out their roles, including (but not limited to) members of the Recruitment Team and the recruitment panel for the role for which you have applied.

We may also share your personal data with selected third parties who are external to Davies Group, for example where it is necessary:

- To obtain pre-employment references from your past employer(s).
- To carry out pre-employment background checks, including credit and criminal record checks.
- To obtain confirmation from regulators of all necessary regulatory permissions, or to otherwise make appropriate notifications to regulators, where it is a requirement of the role for which you have applied.
- To comply with our obligations under The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).
- To obtain the services of third-party service providers who carry out activities, provide services, or undertake business operations on Davies Group's behalf.

In any such cases, the data we share will be limited to that which is strictly necessary and will be subject to appropriate contractual and confidentiality arrangements being in place.

Additionally, all of our third-party service providers are required to take appropriate security measures to protect your personal data, in line with Davies Group policies, and we do not allow them to use your personal data for their own purposes under any circumstances.

6. How Long We Keep Your Personal Data

We will keep your personal data for as long as necessary to fulfil the purposes that we describe in this Privacy Policy:

- If your application is successful, this will typically be for no longer than 6 years from the termination of your employment with Davies Group, with some exceptions.
- If your application is unsuccessful, it will typically be for no longer than 12 months from the date of your unsuccessful application, with some exceptions.

If you require any further information, this can be obtained by contacting the Recruitment Team.

7. Automated Decision Making

If you apply for a role with Davies, you will be asked if you have the right to work in the location where the role is based. If you answer "No" to this question, then your application may be automatically rejected. Should you disagree with this decision, you have the right to request that a human reviews the decision by contacting the Recruitment Team.

Davies Group will not process your personal data for any other purpose during the recruitment and selection process based on a fully automated decision. We will notify you in writing if this position changes.

8. International Transfers

From time to time, it may be necessary for Davies Group to transfer your personal data outside the UK and/or EEA. In any such circumstances, we will always ensure that your personal data continues to be processed in accordance with UK/EU data protection laws, and under strict organisational, technical, and contractual controls.

If you would like to understand more about this, please contact Davies Group's Data Protection Officer at DPO@davies-group.com.

9. Your Rights

Under UK/EU GDPR, you may be able to exercise several individual rights, including:

- The right to be informed – you have the right to be informed about the collection and use of your personal data.
- The right of access – you have the right to ask us for a copy of the personal information we hold about you.
- The right to rectification – you have the right to ask us to rectify personal information you think is inaccurate, or to complete information you think is incomplete.
- The right to erasure (be forgotten) – you have the right to ask us to erase your personal information, in certain circumstances.
- The right to restrict processing – you have the right to ask us to restrict the processing of your personal information in certain circumstances.

- The right to data portability – you have the right to ask that we transfer the personal information you gave us to another organisation, or to yourself, in certain circumstances.
- The right to object – you have the right to object to the processing of your personal information, in certain circumstances.
- Rights in relation to automated decision making and profiling – you have the right to request human intervention where a decision has been taken about you using fully automated decision-making or profiling.

If you wish to exercise any of your individual rights, please contact the Recruitment Team.

10. Making a Complaint

If you have any concerns about our use of your personal information, you can make a complaint to Davies Group's Data Protection Officer by emailing DPO@davies-group.com.

Whilst we hope we can resolve any concerns between us, you also have the right to lodge a complaint with the supervisory authority in the country where you work, or where you consider any data protection rules to have been breached. If you are in the UK, this would be the Information Commissioner's Office (ICO), who you can contact via their website: <https://ico.org.uk/make-a-complaint/>.

Otherwise, a full list of European supervisory authorities and their contact details can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

11. Changes to This Privacy Policy

We reserve the right to update this Privacy Policy at any time, and we will provide you with a copy of the updated Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about changes to the processing of your personal information.

This Privacy Policy was last updated on 10 May 2024.