

Data Privacy Notice

Job Applicants & Employees

1. Introduction

Pythagoras is “data controller”, this means we are responsible for deciding how we hold and use personal information about you. This privacy notice is to make you aware of how and why your personal data will be used and how long it will be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (EU 2016/679 GDPR).

2. Data Protection Principles

We will comply with data protection law and principles, 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 which 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 as long as is necessary for the purposes we have told you about.
- Kept securely.

The General Data Protection Regulations (GDPR) will apply in the UK from 25 May 2018 and will replace the Data Protection Act 1998. Pythagoras aims to remain fully compliant with the Data Protection Act until it is replaced, and will be ready for the GDPR changes in May 2018.

Pythagoras recognises that under the Act it may have responsibilities as a Data Processor for some client services and the specific obligations that apply in these circumstances.

Pythagoras will:

- Clearly communicate policies and procedures to staff.
- Deliver training and run regular general awareness campaigns to educate staff on their data protection and security responsibilities.
- Designate responsibility for data protection compliance to a suitable individual within the UK.
- Review and maintain appropriate records of processing activities and manage any identified risks.
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk involved with the data processing.
- Ensure processes are in place to respond to the data controllers request; for information (in relation to subject access requests); to correct inaccurate records; restrict the processing of

an individual's personal data, the provision of data in a structured, commonly used and machine readable form.

- Seek written authorisation from the data controller before engaging the services of a sub-processor.
- Ensure client agreements contain standard contract clauses covering data erasure, retention and disposal.
- Pythagoras will review Information Commissioner Office guidance to ensure ongoing compliance with the General Data Protection Regulations.

3. What information do we hold about you?

Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities.

- Name;
- Age/date of birth;
- Birth number;
- Sex/gender;
- Photograph;
- Contact details;
- Education details and qualifications;
- Employment history;
- Emergency contacts and details of any dependants;
- Referee details;
- Immigration status (whether you need a work permit);
- Nationality/citizenship/place of birth;
- A copy of your driving licence and/or passport/identity card;
- National Insurance number (or equivalent in your country) and any other tax-related information;
- Medical information relating to physical or mental health, including disability-related information;
- Details of any criminal convictions if this is required for a role that you are interested in applying for;
- Details about your current remuneration, pensions and benefits arrangements;
- Information on your interests and needs regarding future employment;
- Extra information that you choose to tell us;
- Extra information that your referees choose to tell us about you;
- IP address;

Please note that the above list of categories of personal data we may collect is not exhaustive.

4. How do we collect your personal data?

We collect Candidate and Employee personal data in three primary ways:

- Personal data that you, the Candidate or Employee, give to us;
- Personal data that we receive from other sources; and
- Personal data that we collect automatically.

Personal data you give to us

Pythagoras needs to know certain information about you in order to discuss with you relevant job opportunities, to comply with statutory requirements (such as right to work checks), form a contract of employment and administer that contract.

There are numerous ways you can share your information with us. It all depends on what suits you. These may include:

Candidates:

- Entering your details on Pythagoras websites, via third party recruitment websites or via an application form, as part of the registration process;
- Leaving a hard copy CV with a Pythagoras employee;
- Emailing your CV to a Pythagoras employee or HR or being interviewed by them;
- Applying for jobs through an agency who then forward your details to Pythagoras;

Employees:

- Completing your details onto a new starter form.
- Emailing HR via HR@pythagoras.co.uk

Personal data we receive from other sources

We also receive personal data about job applicants and employees from other sources. These may include personal data received in the following situations:

- Your referees may disclose personal information about you;
- An agency may share personal information about you with us;
- We may obtain information about you from searching for potential candidates from third party sources, such as LinkedIn and other job sites;
- If you 'like' our page on Facebook or Instagram or 'follow' us on Twitter we may receive your personal information from those sites;
- Information from statutory authorities such as HMRC.

5. How do we use your personal data?

We generally use Candidate data in the following ways:

- Recruitment activities;
- Equal opportunities monitoring; and
- To help us to establish, exercise or defend legal claims.

We generally use Employee data in the following ways:

- To process pay and benefits;
- To manage employee relations
- Equal opportunities monitoring; and
- To help us to establish, exercise or defend legal claims.

Here are some more details about each:

Recruitment Activities

We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate. Please note that this list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activity;
- To be able to facilitate the recruitment process;
- Carrying out our obligations arising from any contracts entered into between us;
- Facilitating our payroll processes;
- Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object.

Equal opportunities monitoring and other sensitive personal data

We are committed to ensuring that our recruitment and employment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, or age. Where appropriate and in accordance with local laws and requirements, we'll use this information on an anonymised basis to monitor our compliance with our equal opportunities policy. We may also disclose this (suitably anonymised where relevant) data to Clients where this is contractually required or the Client specifically requests such information as part of a bid or tender.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We'll ask

for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other sensitive personal data about you, such as health-related information or details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying for. We will never do this without your explicit consent.

If you are not happy about this, you have the right to withdraw your consent at any time.

To help us to establish, exercise or defend legal claims

In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

To process pay and benefits

We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate. Please note that this list is not exhaustive.

- Ensuring payroll can be processed accurately and appropriately;
- Enabling access to employee benefits provided;
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties;
- Enabling annual reviews of remuneration.

To manage employee relations

We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate. Please note that this list is not exhaustive.

- Communicating changes to Company policy and to monitor adherence.
- Monitoring and managing attendance.
- Facilitate talent management processes to enable succession planning.
- Managing disciplinary, grievance, change programmes, restructuring or other organisational or procedural matter.
- Complying with the duty of care to our employees (particularly in relation to medical information).
- Referencing where you have given your explicit consent for us to respond to a reference request.

Profiling

At present all our recruitment and employee management activities involve human-decision making during the process and we do not use fully automated technologies such as expert systems or machine learning.

6. Who do we share your personal data with?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data;
- Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers.
- Third party storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- If Pythagoras merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.
- Individuals and organisations who may request references subject to your explicit consent to respond to such requests.
- Third parties who provide benefits or payroll processing services. In these instances only data required to administer these services will be provided.
- Individual names, roles, skills and experience in the form of a basic biography may be shared with prospective customers for the purposes of bids and tenders.

7. How do we safeguard your personal data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

8. How long do we keep your personal data for?

We will delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve

your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

We will consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication.

Employee information is covered in the retention of records policy.

9. How can you access, amend or take back the personal data that you have given to us?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities, you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or Delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to

do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data are no longer necessary for the purpose for which we originally collected and/or processed them;
- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
- for public health reasons in the public interest;
- for archival, research or statistical purposes; or
- to exercise or defend a legal claim.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;

- where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability: If you wish, you have the right to transfer your personal data between data controllers. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data) you should contact us. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

10. Who is responsible for processing your personal data on the Pythagoras website?

Personal data which is captured via our website is processed by our Internal IT function and may be viewed by Human Resources personnel.

11. Our legal basis for processing your data

Article 6(1)(f) of the GDPR says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are

overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

We think it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or consider you for roles and assess your skills against our vacancies now and for a period of time after your application.

We have our own obligations under the law. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

We don't think these activities prejudice individuals in any way however, you do have the right to object to us processing your personal data on this basis.

12. Contacts

To exercise your rights under GDPR or to request further information please contact Pythagoras Data Protection Officer:

Lara Bell

Director of People and Culture

Ashwood House, Grove Business Park, Waltham Road, Maidenhead, SL6 3LW

If you wish to lodge a complaint the relevant supervisory authority is:

The Information Commissioner's Office

<https://ico.org.uk/concerns/>