

UK Recruitment Privacy Notice

Scope and Overview

Insider are committed to protecting and respecting your privacy. This Recruitment Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practises regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) and the version of the GDPR retained in UK law (the “UK GDPR”) the Data Controller is Business Insider Europe Ltd, a subsidiary of Insider Inc.

We use Greenhouse, an online ATS application, to assist with Our recruitment process. We use Greenhouse to process personal information as a data processor on Our behalf. Greenhouse is only entitled to process your personal data in accordance with Our instructions.

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to Our processing of your personal information.

Where you apply for a job opening via the application function on a job site or similar online service provider (“Partner”), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Notice.

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 that 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 necessary for the purposes we have told you about.
- Kept securely.

Your Personal Data

Information We collect from You

In connection with your application for work with us , we collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills experience, right to work, desired salary, willingness to relocate, job preferences and other information related to compensation and benefits that you provide to Us.
- If you contact Us, We may keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.

We may also collect, store and use “sensitive personal data” as further detailed below.

Information We Collect From Other Sources

Greenhouse provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally or reference information and information received from background checks, where applicable. We may have information related to previous applications to Insider or previous employment history with Insider.

The personal data listed in this notice is mandatory in connection with our recruiting activities. Failure to provide or allow us to process mandatory personal data may affect our ability to accomplish the purposes stated in this Privacy Notice.

Uses Made Of Your Personal Data

Lawful basis for processing

It is in our legitimate interests to decide whether to appoint you to the role for which you applied, since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract with you.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

Purposes of processing

We use information held about you in the following ways:

- To consider your application, including assessing skills, qualifications and competencies for the purposes of determining suitability in respect of a role for which you have applied.
- To verify your information and carry out employment, background and reference checks, where applicable, subject to your consent where required by applicable law.
- To consider your application in respect of other roles.
- To keep records relating to our hiring processes, for only as long as appropriate under the circumstances.
- To create and submit reports as required by applicable laws or regulations.
- To comply with our legal, regulatory, or other corporate governance requirements.
- To analyse and improve our application and recruitment process.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- To help our service providers (such as Greenhouse and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve their services.

We may also process your personal data for your own legitimate interests, including for the following purposes:

- To prevent fraud
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

Collection and Use of Sensitive Personal Data

We may collect and process data relating to disability, cultural, genetic or biometric information when you voluntarily provide it, or we receive them from a third party with your consent, when relevant for a particular position to carry out our obligations under employment law, or as applicable law otherwise permits to determine appropriate reasonable adjustments to support you in your role or to evaluate fitness for a particular position. Where we have a legitimate need to process sensitive personal data for purposes not identified above, we will only do so only after providing you with notice and obtaining your prior, express consent. We do not envisage that we will process information about criminal convictions.

Automated decision making/profiling

We may use Greenhouse's technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by Our staff. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We are allowed to use automated decision-making for the purpose of finding suitable candidates in accordance with the UK GDPR where we have notified you of the decision and given you an opportunity to request a reconsideration.

Disclosure of Your Information

As set out above, we pass your information to our third party service providers, including Greenhouse, who use it only in accordance with our instructions and as otherwise required by law. Where you have applied to a job opening through another service provider, we may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

Data sharing

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the recruitment process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks, and data storage or hosting. These third-party service providers may be located outside of the country in which you live or the country where the position you have applied for is located.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to process your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to administer the application and recruitment process.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- To protect the rights and property of Insider.
- During emergency situations or where necessary to protect the safety of persons.
- If a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction. In these circumstances, we will limit data sharing to what is absolutely necessary, and we will anonymise the data where possible.
- For additional purposes with your consent where such consent is required by law.

Cross-Border Data Transfers

Where permitted by applicable law, we may transfer the personal data we collect about you to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country for the purposes set out in this Privacy Notice. If you are located in the EU, we have implemented Standard Contractual Clauses adopted by the European Commission to secure the transfer of your personal data to the United States and other jurisdictions.

How We store your Personal Data

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data 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.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

Where We store your Personal Data

The data that We collect from you and process using Greenhouse's Services may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK or the EEA who work for Us or for one of our suppliers. Such staff may be engaged in the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to i) Greenhouse's staff in the USA or ii) may be stored by Greenhouse's hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA. A Data Processor Agreement has been signed between Greenhouse and its overseas group companies, and between Greenhouse and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

How long we keep your Personal Data

We will hold all the data for 1 year. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you (or by another person engaged by the Customer); or

- receipt of a written request by you (or another person engaged by the Customer) to us.

If you are offered and accepted employment with Insider, the personal data we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal data policies. If you do not become an employee, or, once you are no longer an employee of Insider, we will retain and securely destroy your personal data in accordance with our data retention period and applicable laws and regulations.

Your rights

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the UK GDPR](#).

If you would like to exercise any of those rights, please contact us using our Contact details below, giving proof of your identity and address, and let Us know the information to which your request relates.

How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The [General Data Protection Regulation](#) and the UK GDPR also gives you the right to lodge a complaint with a supervisory authority, in particular (under the GDPR) in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint>

Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to privacy@insider.com.