



Privacy Notice

This Privacy Notice is applicable to individuals who are providing their personal data for the purposes of carrying out background screening as required by a Requesting Organisation.

For more information about how First Advantage Europe Ltd ('First Advantage') together with its subsidiaries and affiliates (collectively, "us," "we," or "our") is committed to the responsible management, use, and protection of personal information for all our products and services please see our [Privacy Policy](#).

Our registered head office is First Advantage Europe Ltd, Standard Court, Park Row. Suite 203, Nottingham NG1 6GN, United Kingdom.

In this Privacy Notice:

The 'Requestor' or 'Requesting Organisation' means the company who is requesting the check, in most cases this may be your employer or potential employer, data controller.

This Privacy Notice applies to the actions carried out by First Advantage, data processor, on behalf of the Requesting Organisation and may not provide full details of what the Requestor intends to do with your personal data. Please refer to their privacy notice or contract provided to you by the Requesting Organisation for further details on how they may use your personal data.

We review this Privacy Notice on an annual basis, sooner if changes to regulation require it or First Advantage change the way we process your personal data.

This policy was last updated on 1st February (Updating First Advantage address)

How we collect and use your information

This is an overview of:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure
- your rights

The information we collect

We collect information about you from different institutions or sources, depending on the type of check being conducted. The Requesting Organisation will be able to provide you with information as to which checks are needed for your application.

Information we collect includes:

- directly from you; this includes:
 - personal details, e.g. name, previous names, gender, date and place of birth
 - contact details, e.g. address, email address, landline and mobile numbers
 - information concerning your identity e.g. photo ID, passport information, National Insurance number, National ID card and nationality
 - user login and subscription data, e.g. login credentials for the Know Your People or Online Disclosures web portal
 - other information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise
 - we may also ask you to provide copies of documents such as your Driver Licence or Passport in order to support your application. The type of information collected will depend on the type of check requested
- from a third party acting on your behalf e.g. your employer (as the 'Requesting Organisation')
- from other organisations in relation to a criminal record check e.g. Disclosure and Barring Service, Disclosure Scotland, or Access NI
- from other organisations in relation to other checks that you or the Requesting Organisation ask us to complete; these include:
 - information from third party providers, e.g. information that helps us to combat fraud and to enable us to verify your identity. These include credit reference and fraud prevention agencies. Such credit reference or fraud prevention agencies may keep a record of that information.

We'll only collect your information in relation to the services you apply for through this web portal.

How we'll use your information

We'll only use your information where we, on behalf of the Requesting Organisation, have your consent, or any another lawful reason for using it.

These reasons include where we:

- ® need to pursue legitimate interests in providing our products and services to the Requesting Organisation;
- ® need to process the information to comply with a legal obligation;
- ® need to establish, exercise or defend our legal rights.

We'll only use your information in relation to the services you apply for through this web portal.

The reasons we use your information include to deliver our products and services to the Requesting Organisation.

These may include:

- Criminal Record Check
- Bank Verification
- Adverse Financial Check
- DVLA Driver entitlement
- Politically Exposed Persons (PEP) & International Sanctions check
- Address Validation
- Right to Work
- Social Media
- UK Instant Employment History
- Digital Right to Work / Digital Identity
- to confirm your identity and address
- to carry out the check that has been requested by the Requesting Organisation

We may use automated systems to help us carry out identity verification checks.

Who we share your information with

We use our affiliates and/or third-party service providers who may process your personal data on our behalf depending on your history and the screening requirements of the Requesting Organisation.

We may share your information with other third-parties where lawful to do so including where we or they:

- have asked you for your permission to share it, and you've agreed, which includes the following for criminal record checks:
 - Disclosure & Barring Service
 - Disclosure Scotland
 - Access NI
- have a legitimate business reason for doing so, e.g. identity verification checks, or enable another company to provide you with services you've requested. These services include:
 - Identity Verification
 - Bank Verification
 - Adverse Financial Check
 - DVLA Driver Entitlement
 - Politically Exposed Persons (PEP) & International Sanctions check
 - Address Validation
 - Right to Work

- Social Media
- UK Instant Employment History

For identity verification checks, a search "footprint" will be recorded on your credit report; When we make a search request, the credit reference agencies may make a note on your file that First Advantage has done a search. Other organisations will be able to see that First Advantage made a search of your personal data. However, this is not a "credit search" and will not affect your ability to obtain credit in the future.

To learn more about what the credit reference agencies do, what information they hold, and what your rights are, go to their websites below:

Experian.co.uk/legal/crain

Equifax.co.uk

Criminal Records Checks

If your application includes a criminal record check from Disclosure & Barring Service

Please ensure you read the information on Your rights as an applicant of the Disclosure & Barring Service. This information is available at: <https://www.gov.uk/government/publications/dbs-privacy-policies>

Disclosure & Barring Service will provide First Advantage with a result indicator. This will show as "Clear" or "See Paper Certificate". We will also provide this information to the Requesting Organisation. Before you submit your application, we will ask you to confirm that you are happy for us to receive this information from the Disclosure & Barring Service.

If there are any convictions present on your criminal record, and where you have requested to receive the certificate, a paper certificate will be produced and sent via post to the address you provide in the application, which may be your home address. Neither the Requesting Organisation, nor First Advantage will be able to see any of the conviction data, unless you decide to share this information with them by requesting the paper certificate is directed to them or providing them with a copy of the paper certificate.

Disclosure & Barring Service - Update Service

The Disclosure and Barring Service (DBS) Update Service is an online subscription service that lets you keep your standard and enhanced DBS certificates up-to-date, view your details, and see who's checked if anything's changed on your certificate. It also allows the Requesting Organisation to check a certificate online, with your consent.

To allow First Advantage to assist the Requesting Organisation, we will ask for your consent to act on the Requesting Organisation's behalf and to be able to check if anything has changed on your certificate. We will ask you for consent at during the application process if this service has been requested.

If your application includes a criminal record check from Disclosure Scotland

Before you submit your application, we will ask you to confirm that you are happy for us to receive your certificate from Disclosure Scotland. We will provide a copy of this to the Requesting Organisation and retain a copy of the disclosure certificate until 6 months after completion.

DVLA Driver entitlement

If your application will include a Driving Licence check, we will ask DVLA for your driver record information and may make repeat request for this, at a time and frequency, which the Requestor will determine.

We will provide information relating to your driver record to the Requestor. This will include personal details, driving entitlements, endorsement details, disqualifications, convictions, photo images and CPC details (where appropriate).

Before you submit your application, we will ask you to confirm that you understand that we receive this information and provide it to the Requestor.

We will stop processing these checks when either:

- you no longer drive in connection with the Requesting Organisation
- we are no longer engaged by the Requesting Organisation
- three years has passed since the date of approval

How long we'll keep your information

We keep your information in line with our data retention policy and the instructions of the Requesting Organisation.

First Advantage will keep a record of the application data and result of checks made as part of our agreement with the Requesting Organisation for audit purposes.

How long we retain your personal data will depend on the type of checks requested. Please see the below table for details of the retention periods which are applicable to each check type.

We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.

If we don't need to retain your information for this period of time, we will destroy or delete it more promptly.

Check Type	Timescale (maximum)
Identity Verification (Including Adverse Financial) Bank Verification National Insurance Validation PEP & International Sanctions Check	13 months
Digital Right to Work Digital Identity Social Media UK Instant Employment History	24 Months
Criminal Record Check	37 months

DVLA Driver Entitlement	7 years
Right to Work Check	As instructed by the Requesting Organisation
Incomplete or non-submitted applications	6 months

Transferring your information overseas

In order to conduct the relevant checks ordered by the Requesting Organisation, your information may be transferred to and stored in locations outside the European Economic Area (EEA) and the UK, including countries that may not have the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer your information in this way to carry out our contract with the company who is requesting the check and complete the services, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. In some countries the law might compel us to share certain information, e.g. with tax authorities. Even in these cases, we'll only share your information with people who have the right to see it.

How we keep your information secure

We use a range of measures to keep your information safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

ISO 27001 Certification

First Advantage Europe Ltd are a global specialist in identity data intelligence for some of the largest organisations in the world, which is why First Advantage Europe Ltd aim to set the highest standards of information security and in doing so, have developed an Information Security Management System (ISMS) to meet the requirements of the ISO 27001:2013 standard. Its aim is to protect the confidentiality, integrity and availability of First Advantage Europe Ltd and client (Requesting Organisation or Requestor) held information resources and assets, thus safeguarding First Advantage Europe Ltd and its clients from unauthorised access, compromise and/or disclosure of data.

Your rights

You have a number of rights relating to your information e.g. to see what we hold, to ask us to share it with another party, ask us to update incorrect or incomplete details, to object to or restrict processing of it, to make a complaint. For more information about these rights, please visit our [EEA and UK Privacy Policy](#).

If you have any questions about how your personal data is used by First Advantage or you wish to exercise your rights by contacting us using the details set out in the 'Questions and Complaints' section in our [EEA and UK Privacy Policy](#).

Your rights under GDPR and UK GDPR will also depend on the reason the Requestor is carrying out the check, the type of check carried out, and their lawful basis for processing your data. You should contact them if you would like any information on the rights that are applicable to you for this check.

Cookies

Cookies are small pieces of information which are transferred from our site and are stored on your hard drive or devices memory in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first-party cookies.

Cookies we use

- **We use Session cookies**

These are temporary cookies which are deleted when you close your browser or leave your session on our site. We link the data in the cookie to the information you provide us in the site. The data we put in these cookies is encrypted, so only our site can read them.

All our cookies are necessary for the provision of our services.

We do not employ any third-party advertising cookies on our site.

- **We use web analytics cookies**

We collect some site statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

These cookies are used to collect information about how visitors use our site. We use this information to compile reports and to help us improve the site and our service to you. The cookies collect information in an anonymous aggregated form, including the number of visitors to the site, where visitors have come from and the pages on our site they visit.

We use New Relic to monitor site performance. [Find out more](#) about how we use this data.

If you'd rather we didn't use cookies when you visit our website, click on the link below for information on how to configure your browser settings to reject cookies and how to delete cookies. Please note that this web portal may not work correctly if you disable cookies.

<http://youronlinechoices.com/>

How to contact us

Please contact us at GDPR@fadv.com, if you have any questions about how your personal information is used by First Advantage or if you are not happy.

Privacy & Data Compliance Team

Address: First Advantage Europe Ltd, Standard Court, Park Row. Suite 203, Nottingham NG1 6GN, United Kingdom

Email: Email us at GDPR@fadv.com

Your right to lodge a complaint with the Supervisory Authority

Where you believe that First Advantage has not taken our responsibilities with your personal data seriously, you have the right to complain to the UK Supervisory Authority: <https://ico.org.uk/make-a-complaint/>. Its details are:

Information Commissioners office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 113 or 01625 545 745

Email: casework@ico.org.uk

Data protection authorities for other EU and EEA member countries can be located here: https://edpb.europa.eu/about-edpb/board/members_en.