

# Privacy Policy - Recruitment

Updated: 29<sup>th</sup> September 2025

## About this document

This document provides a summary of how we process your data when you apply for a job with us, and your associated rights.

## Table of Contents

1. Introduction.....	3
Who are we in relation to your personal data? .....	3
2. What this policy applies to.....	3
3. Collecting your personal data.....	3
What data we collect.....	3
How we collect the data .....	4
4. How we use your data .....	4
Purposes for which we use your personal data.....	5
Automated Decision-Making.....	5
5. Disclosure of your data.....	6
6. International transfers .....	6
7. Data security.....	7
8. Data retention.....	7
9. Your rights .....	7
10. Changes to this policy .....	8
11. How to contact us .....	8
12. General provisions.....	8

## 1. Introduction

This privacy policy explains the privacy practices at Thanks Ben Ltd., a company incorporated in England & Wales, with its registered office on 9th Floor, 107 Cheapside, London, United Kingdom, EC2V 6DN and company number 12335851.

Please read this policy carefully as it contains important information on who we are, how and why we collect, store, use and share any information relating to you (your personal data) when you apply for a role with us. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator if you have a complaint.

### Who are we in relation to your personal data?

- Thanks Ben is the data controller for the purpose of managing and facilitating recruitment of employees to our business.

If you have any questions about how we protect or use your data, please email us at [privacy@thanksben.com](mailto:privacy@thanksben.com).

## 2. What this policy applies to

This privacy policy relates to your data when you make an application, through our recruitment platform or otherwise, and explains the types of data we process for this. It also describes where we collect this data from and how we may store, share, or transfer it. The policy also describes how long this data will be stored for, and your rights in relation to it.

## 3. Collecting your personal data

We believe that your personal data belongs to you, and you only. With that said, we have to collect and process some of your personal data to allow you to apply for employment with our business.

### What data we collect

The personal data we collect about you may depend on the role(s) you apply for, as some may have different requirements. We may collect and use the following personal data about you which we have grouped together as follows:

- **Contact Data** including your name, postal address, email address and telephone number.
- **Application Data** that we collect from you during the recruitment process (either directly or from a third party), such as your application form, CV, right to work, records of qualifications, and referees.
- **Candidate Assessment Data** such as any interview scores, feedback, and any correspondence generated during the recruitment process.
- **Interview Recording and Transcription Data**, such as audio and/or video recordings of interviews (including any screen-share where applicable), machine-generated transcripts, time stamps and call metadata (e.g. date, duration, participants), and qualitative notes or analytics (such as talk-time ratios) created to assist interviewers. We do not use biometric identification or emotion-recognition.

- **Demographics Data** (if you answer our optional survey questions, or provide this information during the recruitment process), such as your gender identity, nationality, ethnic background, sexual orientation, disability.
- **Other Information** that may be generated if you visit our premises, such as visitor logs and recorded footage from CCTV.

We may also collect, use, and share **Aggregated Data** such as statistical or demographic data. This may be derived from your personal data but is not considered personal data in law as this data cannot directly or indirectly reveal your identity. For example, we may aggregate your Demographics Data to calculate the percentage of applicants from a specific background. If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data, which will be used in accordance with this privacy policy.

## How we collect the data

We will primarily collect personal data from you directly. This will include personal information that we request, or you otherwise provide, as part of the recruitment process, or in response to any surveys or questionnaires. The specific data we collect from you may depend on your circumstances, the role you're applying for, and the law.

We may create Interview Recording and Transcription Data when you join an interview we host. Recordings are captured via our interview tools (for example, a video-conferencing platform and our conversation-intelligence provider, Gong) and stored securely in those systems.

As permitted by law, and where necessary in line with the purposes we're processing your data for, we may also collect personal data about you from other sources, including:

- Government organisations, to ensure compliance with taxation laws, verify your identity and obtain DBS checks to evaluate your eligibility for employment for certain positions
- Public authorities, financial institutions and Cifas to evaluate your eligibility for employment for certain positions
- Recruitment agencies (including executive search agencies)
- Referees you have nominated
- LinkedIn profiles or profiles on other job-related sites
- Other publicly available information that may be posted on the internet, in newspapers, social media etc. where used in connection with investigations or vetting checks, or which is otherwise brought to our attention or available to us

## 4. How we use your data

We use your information when the law allows us to in the following ways:

- (a) to process your application and, if successful, onboard you as an employee at Ben;
- (b) to comply with any applicable legal and/or regulatory requirements;
- (c) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

You have the right to withdraw consent by contacting us, using the details mentioned within this policy.

## Purposes for which we use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To process your application for employment, including assessing your application and inviting you for interview.	<ul style="list-style-type: none"> <li>Contact</li> <li>Application</li> <li>Candidate Assessment</li> <li>Other Information</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract</li> <li>Necessary for our legitimate interests (to process applications effectively)</li> </ul>
Recording interviews to support accurate note-taking, provide a consistent and fair recruitment experience, investigate complaints and improve our hiring process (including interviewer training/quality assurance).	<ul style="list-style-type: none"> <li>Candidate Assessment</li> <li>Interview Recording and Transcription Data</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to run an effective and fair hiring process).</li> </ul>
Complying with applicable legal obligations and our policies, including equality of opportunity requirements as an employer and making reasonable adjustments to the process based on accessibility requirements.	<ul style="list-style-type: none"> <li>Candidate Assessment</li> <li>Demographics</li> </ul>	<ul style="list-style-type: none"> <li>Necessary to comply with a legal obligation</li> <li>Consent (where information is willingly provided by you)</li> </ul>
Carrying out background or reference checks (where applicable).	<ul style="list-style-type: none"> <li>Contact</li> <li>Application</li> <li>Candidate Assessment</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for our legitimate interests (to ensure you are suitable for the role)</li> </ul>
Providing you with information of roles that may be of interest to you.	<ul style="list-style-type: none"> <li>Contact</li> <li>Application</li> <li>Candidate Assessment</li> </ul>	<ul style="list-style-type: none"> <li>Consent (where information is willingly provided by you in the process)</li> </ul>

## Automated Decision-Making

Automated decision-making means making a decision about you without any human involvement (e.g. computerised filtering). We may use automated transcription and basic analytics to assist human reviewers, but we do **not** make recruiting decisions based solely on automated decision-making.

If we rely solely on automated decision-making in future that could have a significant impact on you (e.g. automated psychometric and behavioural testing), we will notify you, provide you an opportunity to express your views, and will provide any other safeguards as required by law.

## 5. Disclosure of your data

We may share your personal data with selected third parties where we have a lawful basis to do so including:

- (a) companies within our group of companies, located in or outside of the United Kingdom and European Union, for the supply of our Services.

We may disclose your personal information to third parties:

- (a) to provide our Services to you, in which case we may share your personal data with other companies of our group or with our business partners, located in or outside of the European Union.
- (b) if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to protect the rights, property, or safety of Thanks Ben Ltd., our customers, or others.
- (c) to prevent and detect fraud or crime.
- (d) in response to a subpoena, warrant, court order, or as otherwise required by law.

The sub-processors which we currently use to provide our services include:

Name of sub-processor	Purpose	Entity Country	Security measures
Ashby, Inc.	Recruitment Platform, including Interview Recording & Transcription	United States	SOC 2 CSA STAR DPA & SCCs
Google Cloud EMEA Ltd.	Cloud Service Provider	Ireland	ISO 27001 SOC 2 CSA STAR DPA & SCCs
Zinc Work Ltd.	Employment Vetting Platform	United Kingdom	ISO 27001 DPA & SCCs
Gong.io Ltd	Interview Recording & Transcription (secondary provider)	United States	ISO 27001 SOC 2 DPA & SCCs

## 6. International transfers

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanisms used by us when transferring your personal data out of the UK, or more information around supplementary measures post Schrems II.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so, typically within 72 hours where feasible.

## 8. Data retention

If your application is unsuccessful, we will retain your data for a period of 12 months. The reasons we do this are:

- In case the offer to a successful candidate falls through, and we want to make an appointment from the existing applications;
- In case a related vacancy arises, and we would like you to consider applying for it;
- In case we need to defend any legal claims.

If your application is successful and you join us at Ben, your data will be held in line with our employee privacy notice.

After 12 months, we may contact you to ask if we can retain your data further, for example if we have a new role due to open that we feel you may be a good fit for. If we do not receive your consent, we will automatically and irreversibly anonymise your data, creating aggregate data to track metrics, as described in section 3.

## 9. Your rights

You have specific rights available under the UK GDPR, for which further information can be found below. Should you wish, you can exercise any of these rights at any time by contacting us at [privacy@thanksben.com](mailto:privacy@thanksben.com).

- **The right to access** all personal data held about you.
- **The right to rectification** for any personal data held about you, if it is incorrect, incomplete, or otherwise inaccurate.
- **The right to restrict or object to processing** in certain circumstances if you believe our processing impacts on your fundamental rights and freedoms. We may however demonstrate that we have legitimate grounds to process your data, notwithstanding your rights and freedoms.
- **The right to erasure, or “to be forgotten”** and require that we delete the data that we hold for you, where it is no longer necessary for us to hold it. While we respect your

right to be forgotten, we may still be required to retain your data in accordance with applicable laws. If this is the case, we will inform you of this when we respond to your request.

- **The right to portability of your data** and receive a structured, machine-readable version of your data.
- **The right not to be subject to a decision based solely on automated processing.**

Where we rely on legitimate interests to record interviews, you have the right to object at any time. If you object in advance or during the call, we will switch off the recording and provide a non-recorded alternative with no impact on your application.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us. You may also find it helpful to refer to the guidance from the UK's ICO on your rights under the UK GDPR.

If you do end up contacting us, please:

- provide enough information to identify yourself (e.g. your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you.
- let us know which right(s) you want to exercise and the information to which your request relates.

## 10. Changes to this policy

Any changes we may make to our privacy policy will be posted on this page and, if the changes substantially affect your rights or obligations, notified to you by e-mail (if we have your email address on record).

Please check back frequently to see any updates or changes to our privacy policy.

## 11. How to contact us

Questions, comments, and requests regarding this policy are welcomed and should be sent via email at [privacy@thanksben.com](mailto:privacy@thanksben.com), or addressed to Privacy Team, Thanks Ben Ltd, 9<sup>th</sup> Floor, 107 Cheapside, EC2V 6DN, London, United Kingdom.

We hope we will be able to resolve any issues you may have, but if you feel that we have not addressed your questions or concerns adequately, you have the right to make a complaint with the Information Commissioner's Office in the United Kingdom. You may access their details via <https://ico.org.uk/global/contact-us/>.

## 12. General provisions

Our website may contain links to third party websites, plug-ins, and applications. We are not responsible for the content of such third-party content, or their privacy statement/s. If you provide any information to the third party, then you should check the third-party website to find the applicable privacy policy.

If any provision of this policy is held by a court of competent jurisdiction to be invalid or unenforceable, then such provision shall be construed, as nearly as possible, to reflect the intentions of the parties and all other provisions shall remain in full force and effect.



This policy shall be governed by and construed in accordance with English law, and you agree to submit to the exclusive jurisdiction of the English Courts.