

Candidate Privacy Notice

Bondsmith Savings Ltd · Last updated 31 August 2026

1. Introduction

Bondsmith Savings Ltd ("**we**", "**us**" or "**Bondsmith**") is committed to processing your personal information lawfully, fairly, securely and transparently. This Candidate Privacy Notice explains how we collect and use personal information when you apply for a role with Bondsmith, how long we retain it, who we share it with and the rights available to you.

This notice applies to all job applicants, whether you apply directly, through a recruitment agency or through another channel. It also applies where we identify or approach a prospective candidate through a professional networking site or another lawful source.

Bondsmith is the data controller for the personal information covered by this notice. We process personal information in accordance with the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and other applicable data protection law.

2. What information do we process?

The information we collect depends on the role, how you apply and the stage reached in the recruitment process. We may process the following categories.

2.1 Information you provide directly

- **Identity and contact information:** name, date of birth, home address, email address and telephone number;
- **Application materials:** CV, cover letter, application form responses, work samples and information you provide during the recruitment process;
- **Education and qualifications:** academic qualifications, professional certifications and membership of professional bodies;
- **Employment information:** current and previous employers, job titles, responsibilities, dates of employment, notice period, salary expectations, current remuneration and benefits;
- **Right-to-work information:** nationality, immigration status, passport or visa information, National Insurance number and evidence of your right to work in the UK;
- **References:** referee details and reference information;
- **Recruitment preferences:** availability, preferred working arrangements and any reasonable-adjustment requests; and
- **Other information:** any other information you choose to provide to us in connection with your application.

2.2 Information created during recruitment

We may create or record:

- communications with you;
- interview notes;
- records of recruitment decisions and feedback;

- records relating to identity, right-to-work, regulatory fitness or other pre-employment checks; and
- limited technical and audit information generated by our recruitment systems.

2.3 Information obtained from third parties and public sources

We may obtain information from:

- **Recruitment agencies and referrers:** application materials, employment information and information about your interest in a role;
- **Referees:** information about your employment history, performance and suitability;
- **Screening providers:** the outcome of identity, qualification, right-to-work, financial probity or other pre-employment checks;
- **Professional and regulatory bodies:** information about qualifications, memberships, approvals, restrictions or disciplinary matters, where relevant to the role; and
- **Publicly available sources:** relevant information from professional networking sites, company websites or other lawful public sources.

Where we obtain your information from another source, we will provide this notice within the period required by law, unless an applicable exemption applies.

2.4 Special-category personal information

We do not intentionally request or collect special-category personal information as part of our recruitment process. However, you may choose to disclose limited special-category information during an interview or another recruitment communication, for example information about a health condition or disability where you require a reasonable adjustment. Where this occurs, we will only use the information where necessary and permitted by law.

2.5 Criminal-offence information

As part of our pre-employment screening, we may confirm and process information relating to criminal convictions, offences, proceedings or allegations, where permitted by law.

3. How do we use your information?

We may use your personal information to:

- administer and progress your application;
- communicate with you and arrange interviews;
- assess your skills, qualifications, experience and suitability for a role;
- verify information you provide and obtain references;
- make fair, consistent and appropriately documented recruitment decisions;
- make reasonable adjustments and meet equality obligations;
- verify your identity and right to work in the UK;
- conduct pre-employment screening;
- prepare and make an offer and take steps before entering into an employment contract;
- comply with legal, regulatory, governance, audit and record-keeping obligations;
- prevent and detect fraud or other unlawful conduct, and protect our people, systems and business;

- respond to complaints, requests or legal claims; and
- with your consent where required, consider you for other suitable vacancies.

4. What lawful bases do we rely on?

We may rely on one or more of the following lawful bases under the UK GDPR:

- **Steps before entering into a contract:** where processing is necessary to assess your application and take steps at your request before entering into an employment contract;
- **Legal obligation:** where processing is necessary for us to comply with employment, immigration, equality, regulatory or other legal obligations;
- **Legitimate interests:** where processing is necessary for our legitimate interests or those of a third party and those interests are not overridden by your rights and interests; and
- **Consent:** where you have freely given specific consent for a particular purpose.

Our legitimate interests include recruiting suitable people, maintaining the integrity and security of our recruitment process, keeping appropriate records, meeting governance expectations and protecting our business, people and systems. We balance these interests against your rights and interests before relying on this basis.

Where we rely on consent, it is optional and specific to the relevant purpose. You may withdraw it at any time. Withdrawal does not affect processing already carried out lawfully, and it does not prevent processing that is necessary under another lawful basis.

4.1 Special-category information

We do not intentionally request special-category personal information during recruitment. If you voluntarily disclose such information, we will only process it where necessary and where an applicable condition under Article 9 UK GDPR and the Data Protection Act 2018 permits us to do so. This may include processing necessary to meet our obligations and exercise rights in employment law, make reasonable adjustments, or establish, exercise or defend legal claims. Where appropriate, we may rely on your explicit consent.

4.2 Criminal-offence information

We process criminal-offence information only where Article 10 UK GDPR and an applicable condition in Schedule 1 to the Data Protection Act 2018 permit us to do so. This may include processing for employment, regulatory, fraud-prevention or other purposes permitted by law.

5. Is providing information mandatory?

Some information is necessary to assess your application, take steps towards an employment contract or comply with the law. For example, if you do not provide sufficient information about your experience or qualifications, we may be unable to assess your application. If you do not provide satisfactory evidence of your right to work in the UK, we cannot employ you.

6. Who do we share your information with?

We limit access to colleagues within Bondsmith who need your information for a recruitment, compliance or related purpose. This may include our People or HR team, hiring managers, interviewers, relevant senior management, Risk and Compliance, Legal, IT and information-security personnel.

We may also share your information with third parties where necessary for one of the purposes described in this notice, including recruitment agencies, screening providers, service providers and public or regulatory authorities. We will only share information where it is necessary and lawful to do so. Where a third party processes information on our behalf, it must follow our instructions and comply with appropriate confidentiality and security requirements.

7. International transfers

We may transfer your personal information to recipients outside the UK where this is necessary for one of the purposes described in this notice. Where we do so, we will ensure that the transfer is permitted by data protection law and that appropriate safeguards are in place to protect your information.

8. How long do we retain your information?

We normally retain information collected during the recruitment process for up to 18 months after the recruitment process concludes. We may retain information for longer where necessary to comply with a legal or regulatory obligation or to establish, exercise or defend legal claims.

If you accept employment with us, relevant information collected during the recruitment process will become part of your personnel record and will be retained in accordance with our employee retention arrangements. At the end of the applicable retention period, information will be securely deleted or anonymised.

9. How do we protect your information?

We use appropriate technical and organisational measures designed to protect personal information against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include:

- limiting access on a strict need-to-know basis;
- granting access only to authorised personnel;
- staff training and confidentiality requirements;
- passwords, access controls and other proportionate security measures;
- appropriate due diligence and contracts for service providers; and
- processes for identifying, managing and reporting personal-data breaches.

10. Automated decision-making and recruitment technology

We may use automated tools to support administrative tasks or application screening. These tools may compare information in an application against objective criteria relevant to the role. They are intended to help us process applications efficiently and consistently, not to remove appropriate human judgment.

Where a decision could have a legal or similarly significant effect on you, we will ensure there is meaningful involvement by a suitably trained person unless we lawfully make a solely automated

significant decision. Human reviewers are expected to consider the relevant circumstances, understand the tool's limitations and have authority to challenge or override its output.

If we make a significant decision about you based solely on automated processing, we will use an applicable lawful basis, provide appropriate information about the decision and relevant processing, and implement the safeguards required by law. These include enabling you to:

- make representations about the decision;
- contest or challenge the decision; and
- obtain human intervention.

Additional restrictions apply where special-category information is used. You may contact our Privacy Officer if you want further information about the use of automated processing in your application or wish to exercise the safeguards above.

11. What rights do you have?

Depending on the circumstances and subject to legal limitations and exemptions, you may have the right to:

- **be informed** about how we use your personal information;
- **access** your personal information and receive a copy;
- **rectify** inaccurate information and complete incomplete information;
- **erase** your information in certain circumstances;
- **restrict** processing in certain circumstances;
- **object** to processing based on our legitimate interests, including profiling based on those interests;
- **data portability** where processing is automated and based on your consent or a contract and the other legal conditions apply;
- **withdraw consent** at any time where we rely on consent, without affecting the lawfulness of earlier processing; and
- **receive the safeguards associated with solely automated significant decisions**, including the ability to make representations, contest the decision and obtain human intervention.

These rights are not absolute and may not apply in every case. To exercise a right, contact our Privacy Officer using the details in Section 14. We may need to verify your identity before acting on a request.

12. How can you complain?

If you have concerns about how we use your personal information, please contact our Privacy Officer so that we can investigate and respond.

You also have the right to complain to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection. You can find information about making a complaint at www.ico.org.uk/make-a-complaint or contact the ICO through the details published on its website. Your right to complain to the ICO is not affected by first raising the matter with us.

13. Updates to this notice

We may update this Candidate Privacy Notice from time to time to reflect changes to our recruitment practices, service providers or legal obligations. The current version and its effective date will be made available with our recruitment information. Where appropriate, we will bring material changes to your attention.

14. How can you contact us?

If you have questions, wish to exercise your rights or require further information about this notice, contact our Privacy Officer:

Email: dpo@bondsmith.co.uk

Post:

Bondsmith Savings Ltd
Level 2, 4 Pentonville Road
London N1 9HF
United Kingdom