

# Privacy Policy (Recruitment)

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before and during our recruitment process. A separate and replacement privacy notice will be provided to you to cover your working relationship with us if we do recruit you to work for us.

This notice applies to potential new employees, members, workers, directors, and consultants. This notice does not form part of any contract of employment or other contract to provide services. If you are offered and accept an engagement with us, you will be provided with a new privacy notice which will replace this one and cover you working for us.

References to **we, our, us, or Quantuma Group** in this privacy notice are to the Quantuma Group made up of Quantuma Advisory Ltd, Quantuma Advisory (Yorkshire) Limited t/a Michael Chamberlain & Co Limited and each of its direct and indirect subsidiaries (current and/or future) and joint venture companies trading under the "Quantuma" brand. Details of our main trading entities are in "**Client Facing Entities in the Quantuma Group.**"

References to **we, our** or **us** in this privacy notice also include any insolvency practitioners who work for us and any of our joint venture companies or limited liability partnerships in which we have an interest.

For the purposes of data protection whichever of the members of our Group, our insolvency practitioners and joint venture companies which are processing your personal information will be the controller of any of your personal information.

## 1. PERSONAL INFORMATION

When you interact with us in relation to your work with us, you may provide us with or we may obtain personal information about you, such as information regarding your:

- contact details such as name, title, addresses, telephone numbers, and email addresses.
- date of birth.
- gender.
- marital status and dependants.
- referee details, next of kin, beneficiaries, details of family members and emergency contacts.
- national insurance number and other tax or governmental identifiers.
- bank accounts, payroll, and tax status
- salary, bonus, commission, remuneration, profit share, annual leave, pension, and benefits.
- start date and leaving date.
- location of employment or workplace.
- driving licence(s) (including copies where we are required to hold such information for identification or insurance purposes where you [or other members of your family] are to use our vehicles);
- identification documents such as passport, utility bills, identity cards, etc;
- recruitment (including copies of right to work documentation, past employment history, references and other information included in a CV or cover letter or as part of the application process);
- work records (including job titles, work history, working hours, training records and professional memberships) and education and professional records/qualifications.
- compensation history and charity donation preferences.
- pension and pension entitlements; and
- images in video and/or photographic form and voice recordings.

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We will always aim to make it clear which personal information it is necessary for you to provide, and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask.

### 2. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about employees, members, workers, directors and consultants through the application and recruitment process, either directly from candidates, from online job boards or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, organisations you have worked for, credit reference agencies or other background check agencies.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

### 3. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We generally do not collect, store, and use the following “special categories” of more sensitive personal information regarding you during a job application process:

- information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions.
- information about your trade union memberships.
- information about your health, including any medical condition, health and sickness records, medical records and health professional information and disability information; and
- biometric information about you, for example fingerprints, retina scans.

We generally will not collect all or any of the above types of special category information about you. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis.
- it is necessary for the establishment, exercise, or defence of legal claims.
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent, but we do not normally rely on consent as a basis for processing special category information.

We also do not generally collect criminal records information in relation to you, and if we did, we would process it on the basis of legal obligations or based on your explicit consent.

This note specifically omits ‘health, including any medical condition’ – we do ask (once offered a role) if there are any medical conditions, they wish our first aiders to be aware of. Does that create an issue?

### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this

<b><i>Purpose</i></b>	<b><i>Personal information used</i></b>	<b><i>Lawful basis</i></b>
<b>Making a decision about your recruitment or appointment and managing the recruitment</b>	All the personal information we collect for the purposes of the recruitment process	We need this information to be able to perform and administer the

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<b>process and determining the terms on which you work for us</b>		recruitment process for you to engage you  This is necessary to enter into a contract with you
<b>Checking you are legally entitled to work in the UK</b>	Personal contact details and identification documents and right to work documentation	We have a legal obligation to do so.
<b>Business management and planning, including accounting and auditing, conducting our normal business operations and managing our relationship with you</b>	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you.  We have a legitimate interest to run and manage our business  To establish, defend or bring legal claims
<b>Assessing qualifications for a particular job or task, including decisions about your fitness to work, education, training, and development requirements</b>	Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits and other personal information excluding 'special categories' of personal information and criminal records information	We may be legally obliged to do so  To be able to manage and perform our contract with you  We have a legitimate interest to run and manage our business and to ensure that our workers are suitably trained
<b>Complying with health and safety obligations</b>	Personal identifiers, CCTV footage and other working environment information	We have a legal obligation to comply with Health and Safety laws
<b>Retention of your details for use in relation to future opportunities to work for us and future recruitment and sending to you details of future positions if you ask us to</b>	All the personal information we collect about you excluding special category information and criminal records information	We have a legitimate interest to retain a talent pool in relation to future opportunities and to inform you of opportunities if you have asked us to  We may also obtain your consent.
<b>Dealing with legal disputes involving you, or other employees, members, workers, directors, and consultants, including accidents</b>	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you  We have a legitimate interest to ensure that all legal claims are managed effectively  To establish, defend or bring legal claims

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<b>To ensure network, information, and premises security</b>	Personal identifiers	We have a legitimate interest in ensuring our premises and systems are secure
<b>To conduct data analytics studies to review and better understand worker engagement and retention and attrition rates</b>	Employment or rejection records	We have a legitimate interest in order to improve as an employer
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth; gender; marital status; salary, remuneration, profit share, annual leave, pension, and benefits; location of employment or workplace	We may have a legal obligation to do so, and we have a legitimate interest in doing so to make sure our business is a fair place to work
<b>Storage of records relating to you and records relating to our business</b>	All the personal information about you	To be able to manage and fulfil our contract with you, we may have a legal obligation to do so, and we also have a legitimate interest to keep proper records
<b>For the purpose of complying with any legal or regulatory requirements</b>	All the personal information about you	We may have a legal obligation to comply with legal requirements and we have a legitimate interest in complying with regulatory requirements

You are not under any obligation to provide us with any of your personal information, but if you do not provide it then we may not be able to engage you.

You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to engage you.

### 5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We share personal information with the following parties:

- **Organisations in the same group as us:** if relevant to your recruitment.
- **Your recruitment agency(s) or consultant(s):** For the purpose of managing the recruitment process
- **Our professional advisors:** such as lawyers, accountants, consultants, and other advisors
- **Other service providers to our business:** administration and IT services. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information.
- **Purchasers of our business:** buyers or prospective buyers to whom we sell or negotiate to sell our business.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office.

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- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above unless we have your consent, or we are legally obliged to do so. We do not sell your data.

### 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

Our global presence means that your personal data may be transferred to and stored across the Quantuma Group in connection with the purposes described in this privacy statement. For example, when managing the recruitment process, we may share personal information with Group firms in different jurisdictions that are involved in the recruitment process. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. Transfers of personal data to another jurisdiction will be only:

- To a recipient in a country which provides an adequate level of protection for your personal protection; and/ or
- Under an agreement which satisfies the requirements of the UK GDPR and the EU GDPR for transfer of personal data to data processors or data controllers in another jurisdiction.

We also use a number of suppliers and service providers in connection with the operation of our business who may have access to the personal information that we process, e.g., IT suppliers when providing us with software support, or cloud services. In all cases, your personal information is handled and protected in accordance with data protection law. Where we use cloud services, our data will generally be hosted within the UK or EU, those being the locations which offer the highest level of data protection regulation of all the regions in which we operate. Where any personal data is processed by suppliers outside the EEA in countries that the UK and/or the EU have not assessed as providing an adequate level of protection, we ensure that personal data is adequately protected in accordance with applicable data protection law, and in particular Article 46 of the UK GDPR and the EU GDPR, by using the EU approved model contract clauses to cover the transfer or by ensuring that the supplier has Binding Corporate Rules in place.

If you require more details on the arrangements for any of the above, then please contact us using the details in the **“Contacting us”** section below.

### 7. HOW LONG WE KEEP PERSONAL INFORMATION FOR

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 12 months if you are unsuccessful in your application to work for us.

Exceptions to this rule are information that may be relevant to personal injury claims, employment claims, discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.

### 8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used.
- the right to access the personal information we hold about you.
- the right to request the correction of inaccurate personal information we hold about you.
- the right to request the erasure of your personal information in certain limited circumstances.
- the right to restrict processing of your personal information where certain requirements are met.

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- the right to object to the processing of your personal information.
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them, and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the website of the DPA in your jurisdiction, the details of which can be found in “**Client Facing Entities in the Quantuma Group.**”

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the “**Contacting us**” section below.

If you are unhappy with the way we are using your personal information you can also lodge a complaint with a DPA, usually in the country or state where you work, normally live or where any alleged infringement of data protection laws has occurred. Details of the DPAs where the Quantuma Group has offices can be found in “**Client Facing Entities in the Quantuma Group.**”

### 9. LINKS TO OTHER WEBSITES

We sometimes provide you with links to other websites, but these websites are not under our control. We are not liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by those websites.

We recommend that you check the privacy policy and terms and conditions on each website to see how each third party will process your information.

### 10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice, we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

### 11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email [dataprotection@quantuma.com](mailto:dataprotection@quantuma.com) or write to us using one of the postal addresses in “**Client Facing Entities in the Quantuma Group.**”

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### 12. CLIENT FACING ENTITIES WITHING THE QUANTUMA GROUP

	Data Protection Supervisory Authority	Data Protection Regulation
<b>Quantuma Advisory Limited</b> St Andrews House, 18-29 St Andrew St, London, England, EC4A 3AG	<b>Information Commissioners Office</b> <a href="http://ico.org.uk">ico.org.uk</a>	<b>Data Protection Act, 2018</b> <a href="http://gov.uk/data-protection">gov.uk/data-protection</a>
<b>Quantuma Advisory (Yorkshire) Limited t/a Michael Chamberlain &amp; Co Limited</b> Resolution House, 12 Mill Hill, Leeds LS1 5DQ	<b>Information Commissioners Office</b> <a href="http://hico.org.uk">hico.org.uk</a>	<b>Data Protection Act, 2018</b> <a href="http://gov.uk/data-protection">gov.uk/data-protection</a>
<b>Quantuma (BVI) Limited</b> Trinity Chambers, PO Box 4301, Road Town, Tortola British Virgin Island	<b>Office of the information Commissioner.</b> <a href="http://bvi.gov.vg/content/confidentiality-and-data-protection">bvi.gov.vg/content/confidentiality-and-data-protection</a>	<b>Data Protection Act, 2021</b> <a href="http://bvi.gov.vg/content/confidentiality-and-data-protection">bvi.gov.vg/content/confidentiality-and-data-protection</a>
<b>Quantuma Advisory Limited (Cayman Islands)</b> Suite N404, Flagship Building, 142 Seafarers Way. George Town. Grand Cayman. Cayman Islands	<b>Data Protection Office</b> <a href="https://ombudsman.ky/data-protection">https://ombudsman.ky/data-protection</a>	<b>Data Protection Act 2021</b> <a href="https://ombudsman.ky/data-protection">https://ombudsman.ky/data-protection</a>
<b>Quantuma Advisory Limited (Cyprus)</b> 32 Stasikratous Street 4th Floor 1065 Nicosia Cyprus	<b>Office of the Commissioner for Personal Data Protection</b> P.O. Box. 23378, 1682, Nicosia, Cyprus <a href="mailto:commissisoner@dataprotection.gov.cy">commissisoner@dataprotection.gov.cy</a>	<b>GDPR</b> <a href="http://gdpr.eu/what-is-gdpr/">gdpr.eu/what-is-gdpr/</a>
<b>Quantuma Advisory Limited (Mauritius)</b> 4 <sup>th</sup> Floor Eagle House 15 A5 Wall Street Cybercity 72201 Ebene Mauritius	<b>Data Protection Office</b> <a href="mailto:dpo@govmu.org">dpo@govmu.org</a>	<b>Data Protection Act 2017</b> <a href="http://dataprotection.govmu.org">dataprotection.govmu.org</a>

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<p><b>Quantuma Middle East Limited</b></p> <p>Quantuma Middle East Limited, Index Towers, Office 2205, Level 22, East Entrance, Al Mustaqbal Street, Dubai International Financial Center, Dubai, UAE</p>	<p><b>Commissioner of Data Protection's Office</b> Dubai International Financial Centre Authority Level 14, The Gate Building</p> <p><a href="mailto:commissioner@dp.difc.ae">commissioner@dp.difc.ae</a></p>	<p><b>Data Protection Law DIFC Law No. 5 of 2020</b></p> <p><a href="https://difc.ae/application/files/5316/4906/5576/Data_Protection_Regulations_2020.pdf">difc.ae/application/files/5316/4906/5576/Data_Protection_Regulations_2020.pdf</a></p>
<p><b>Quantuma Poland sp. z o.o. International Advisory Limited</b></p> <p>Quantuma Poland sp. z o.o. Business Link Astoria, ul. Przeskok 2, 00-032 Warsaw, Poland KRS: 0000944120, NIP: 5252892615, REGON: 520988658</p>	<p><b>Personal Data Protection Office</b> ul. Stawki 2 00-193 Warszawa tel. 22 531 03 00</p> <p><a href="mailto:kancelaria@uodo.gov.pl">kancelaria@uodo.gov.pl</a></p>	<p><b>GDPR</b></p> <p><a href="https://gdpr.eu/what-is-gdpr/">https://gdpr.eu/what-is-gdpr/</a></p>
<p><b>Quantuma (Singapore) Pte. Limited</b></p> <p>8 Eu Ton Sen Street #18-81 The Central Singapore (059818)</p>	<p><b>PDPC</b> Singapore</p> <p><a href="https://pdpc.gov.sg/">pdpc.gov.sg/</a></p>	<p><b>Personal Data Protection Act</b></p> <p><a href="https://www.pdpc.gov.sg/Overview-of-PDPA/The-Legislation">https://www.pdpc.gov.sg/Overview-of-PDPA/The-Legislation</a></p>