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Virgin Money – Privacy Notice for Career Site Users & Applicants

We take your privacy seriously and you can find out more here about your data protection rights and how we collect, use, share and store your personal information as a Virgin Money Careers site user or if you apply for a job at Virgin Money.

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. That's why we've developed this Policy which:

- Sets out the types of personal data we collect;
- Explains how we use your personal data;
- Explains when and why we will share your personal data within Virgin Money Group and other thirdparty organisations: and
- Explains the rights and choices you have when it comes to your personal data.

We are what is known as the 'Controller' of personal information we collect and use. This means that we are responsible for deciding how we hold and use personal information about you when you visit our careers site, and when you complete an application for a vacancy with us.

We are required under data protection legislation to notify you of the information contained in this privacy notice. When we say 'we' or 'us' in this notice, we mean Clydesdale Bank PLC trading as Virgin Money, Clydesdale Bank and Yorkshire Bank. Clydesdale Bank PLC is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. When we say 'Group' we mean other members of our group of companies, including holding and subsidiary companies.

Types of information that we collect:

Careers Site Users:

- Your Email address, where you have signed up to receive job alerts. This information will be passed to out Partner Radancy, who provide this service for us.
- User information if you do not sign up to receive job alerts we will allocate you a user number, which will not identify you as an individual and we will use this information to analyse your behaviour and use of the careers site. We will look to determine where we can make improvements to the site, look at user journeys, how impactful the careers site is in relation to engagement and what users are interested in.

Applicants:

- Your name
- Your address
- Your telephone number
- Your email address
- Your occupation
- Communications between you and us about this website or job application
- Information regarding your "right to work" in the UK
- Information you submit as part of any job application (for example your career history, education, salary and CV)
- Information you provide in surveys we may ask you to complete about the application process

- Information you may voluntarily submit as part of any equal opportunities questionnaire, including any self-declared disabilities that we would need to make a reasonable adjustment for to support your application and any possible future employment
- We are also required to complete screening of applicants before and during your application. This will
 include background checks to be sure that anyone we engage is suitable to work with us. We work
 with our partner Verifile to make sure it is always done fairly and will include a credit check, criminal
 record check, International Fraud/Sanctions Search, Reference checks, CIFAS Staff Fraud Search,
 Investigative Directorship Search (UK), UK driving License Check (DVLA) and other background checks.
 Our Pre-screening information section of the application will provide more details.
- Some of the information above will be processed by our Partner Page Up, who provide a candidate application service for us.

Purposes of processing and Lawful basis for processing:

- To provide you with job alerts, in line with your preferences (Legitimate Interest)
- Review and process your application and keep you up to date on its progress (Legitimate Interest)
- For data analytical, assurance and review purposes (i.e. looking at how individuals use the Careers site and to ensure that our recruitment process remains fit for purpose). (Legitimate Interest)
- To resolve grievances and complaints that involve you (Legitimate Interest)
- In relation to any equality questionnaire data, to monitor our equality and diversity composition. (Legal Obligation)
- Any right to work information we collect, we do this in order to ensure we comply with the law in employing you. (Legal Obligation) If you do not provide us with this information, we will not be able to progress your application.
- In relation to any criminal record checks we complete, (Legal Obligation)

Which third-party service providers process my personal information?

The following third-party service providers process personal information about you. They act as data processors for Clydesdale Bank Plc and we have a contractual relationships with them to ensure that all personal information processed by them is in line with our instructions.

Radancy - If you sign up to our job alerts, Radancy will use your personal email address to share with you the latest vacancies in line with to your filtered job search criteria

PageUp use your personal data to process your employment application and keep you up to date with progress.

Verifile use your personal data to undertake background checks on your personal data such as credit checks etc. As part of the vetting process with Verifile, we share your personal information with CIFAS who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct if any of these are detected, you could be refused certain services or work. Your personal information will also be used to verify your identity. For more information please visit <u>https://www.cifas.org.uk/fpn</u>

How is your personal information collected?

When it comes to applying for a role with us, we collect personal information about you from the provision of the services of WebSAF. WebSAF functionality allows candidates to upload commonly asked personal details into an online application form. This information is only uploaded to a Virgin Money online form at the candidate's request. The candidate can then edit any of this information and must then decide to submit it to Virgin Money.

Data transfer

We will not transfer any of your personal information outside of the EEA.

Data retention

We will only retain your personal information for as long as is required for the job alerts and the application process and in any case for no longer than 15 months. You can contact us at any time to discuss how to exercise your data protection rights by emailing us at **DSARCCA.Queries@cybg.com** To discuss how we hold and use your information, please contact us by email at **Data.protection.officer.queries@virginmoney.com** or by post at Group Data Protection Officer, Group Risk, Level 3, 51 West George Street, Glasgow G2 2JJ.

Please contact our Data Protection Officer on the contact details below if you require any additional information or to request deletion.

Rights of access, rectification, erasure, and restriction

Under certain circumstances, by law you have the right to:

• Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

• Request for your personal email address to be deleted if you had provided this for the purposes of job alerts on the careers site by emailing us at **DSARCCA.Queries@cybg.com**. This enables you to remove the email address we hold for you once you have opted out of job alerts on the careers site.

• Request rectification of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

• Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

• Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

• Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- Request the transfer of your personal information to another party. 3 Classification: Private
- Be informed how your data is being processed.

Data protection officer

Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the best standards to protecting your personal information and comply with our responsibilities for data protection. Our DPO can be reached by email at data.protection.officer.queries@virginmoney.com or by post at Group Data Protection Officer, Group Risk, Level 3, 51 West George Street, Glasgow G2 2JJ.

If we can't resolve the issue you have the right to complain to the Information Commissioners Office (ICO). The ICO is the UK's independent body set up to uphold information rights. For further information and contact details <u>https://ico.org.uk</u>