

Privacy Notice- Human Resource

Last updated March 2018

At Loans 2 Go, we always respect the privacy of our employees and are committed to protecting your privacy at all times. In order to comply with its contractual, statutory and management obligations and pre-screening employment responsibilities, Loans 2 Go is required to process personal data relating to its employees, including 'sensitive' personal data, as defined in the Data Protection Act 1998 (the "Act") which includes information relating to health, racial or ethnic origin, and criminal convictions. All such data will be processed in accordance with the provisions of the Act and Loans 2 Go Policy on Data Protection.

Throughout this Privacy Notice we use the term "processing" to cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information. This processing will always be fair and lawful and will at all times comply with the principles of applicable privacy laws in the United Kingdom.

What personal information might we process?

As part of our candidate application and recruitment process Loans 2 Go collects, processes and stores personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application, assessment, pre-employment screening, and your worker permissions. Here are some examples of the type of information we may process. There's a full list in the schedule 1 at the end of this notice.

- Personal details such as name, address, date and place of birth;
- Work history; previous employers, positions, dates, etc.;
- Compensation; basic salary, benefits, bonuses, etc.;
- Education and work history including professional qualifications and skills;
- Employer feedback / references to include regulated references where necessary;
- Nationality /visa /right to work permit information; (e.g. passport, driving licence, National Insurance numbers)
- Results of Pre- employment screening(PES): county court judgements, credit history, criminal records checks, penalties for tax evasion (see sections 1,2 and 3, for more information on PES screening)
- Assessment results e.g. telephone assessment

During the process we also capture some sensitive personal data about you (e.g. disability information). We do this in order to make reasonable adjustments to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting at Loans 2 Go (if successful) and to ensure that we comply with regulatory obligations placed on us with regard to our hiring.

Why do we collect your personal information?

Loans 2 Go will process your personal information where it is required by law or regulation or it is in the legitimate interests of the applicant/employees or Loans 2 Go. It may also be required to process for the purposes of progressing your application or as required by law or regulatory requirements during employment. The purposes for this are set out below.

Contractual responsibilities

Loans 2 Go's contractual responsibilities include those arising from the contract of employment. The data processed to meet contractual responsibilities includes, but is not limited to, data relating to: payroll; bank account; postal address; sick pay; leave; maternity pay; and pension and emergency contacts.

Statutory responsibilities

Loans 2 Go's statutory responsibilities are those imposed on Loans 2 Go by employment law and legislation. The data processed to meet statutory responsibilities includes, but is not limited to, data relating to: tax; national insurance; statutory sick pay; statutory maternity pay; family leave; work permits; and equal opportunities monitoring.

Management responsibilities

Loans 2 Go's management responsibilities are those necessary for the organisational functioning of Loans 2 Go. The data processed to meet management responsibilities includes, but is not limited to, data relating to: recruitment and employment; training and development; absence; disciplinary matters; health and safety; security, including Loans 2 Go-operated CCTV; e-mail address and telephone number; swipe cards; and criminal convictions.

Pre-Employment Screening responsibilities

As part of the Selection process, Loans 2 Go performs a number of screening checks, where permitted by employment law. These checks are only performed on candidates who have been selected for a role. Your consent will be requested before screening checks are performed.

1) Criminal records checks

Given the nature of our business, we have legal and regulatory obligations to ensure that the people we employ can be relied upon to handle client money and information responsibly. We therefore ask questions about any prior civil or criminal proceedings you may have been subject to and may also conduct criminal record checks.

2) Credit reference agencies

We will undertake searches about you at credit reference agencies who will supply us with information, including information from the electoral register, in support of our recruitment decision. The agencies will record details of the search but will not make them available for use by lenders to assess your ability to obtain credit. We may use scoring methods to assess this application and to verify your identity.

You have the right of access to your personal records held by credit reference agencies. We will supply their names and addresses upon request.

3) Fraud prevention agencies

To prevent or detect fraud, or assist in verifying your identity, we may now and periodically make searches at fraud prevention agencies. Should our investigations identify fraud or the commission of any other criminal offence by you (on your part) when applying for, or during the course of your employment with us, we will record details on this on fraud prevention databases. This information may be accessed from the UK and other countries and used by law enforcement agencies and by us and other employers (and potential employers) to prevent fraud. Please contact us if you want to receive details of the relevant fraud prevention databases through which we share information.

Who do we share your personal information with?

Loans 2 Go will only share your information if it is necessary or required (for example in order to carry out Pre-employment screening). In order to perform its contractual and management responsibilities, Loans 2 Go may, from time to time, need to share an employee's personal data with associated parties such as Peninsula. In such cases, these parties will be required to process the data in accordance with the provisions of the Act.

For the performance of the employment contract, Loans 2 Go is required to transfer an employee's personal data to third parties, for example, to pension providers and HM Revenue & Customs.

In order to fulfil its statutory responsibilities, Loans 2 Go is required to provide some of an employee's personal data to government departments or agencies e.g. provision of salary and tax data to HM Revenue & Customs.

Your personal information may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf;
- Employees in HR who have responsibility for certain HR processes (for example recruitment, assessment, pre-employment screening or for investigating issues of non-compliance with laws and regulations, policies and contractual requirements); and
- Employees in IT and system owners who manage user access, facilities or premises

Loans 2 Go may also need to share your information with certain external third parties including:

- Credit checking agencies, criminal checking bureaus, etc.

How do we protect your information?

Our HR and Recruitment systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur.

Keeping personal data up-to-date

Loans 2 Go to take reasonable steps to ensure that any personal data it processes is accurate and up-to-date. However, it is the responsibility of the individual employee to inform Loans 2 Go of any changes to the personal data that they have supplied to it during the course of their employment.

Requesting information

Under the Act, it is possible for individuals to request access to any of their personal data held by Loans 2 Go, subject to certain restrictions. A request for disclosure of such information is called a subject access request. Any such requests should be addressed to Loans 2 Go's Human Resource Department.

Schedule 1: Full list of information we may process

- Name, work and home contact details
- Date and place of birth
- Education and work history
- Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, disability, work permit, or gender)
- Health issues requiring adaptations to working environment
- Health & safety incidents, accidents at work and associated records
- Job title, grade and job history
- Employment contract related information (including compensation, location, hours of work and so on)
- Leaves of absence (such as maternity leave, sickness absence)Disciplinary / grievance records
- Time and attendance details
- Bank account details for salary payment purposes
- Expenses such as travel and expenses claimed
- Skills and qualifications
- Training history and plans
- Results of employee screening, where relevant
- Details provided in relation to Conduct policies (such as conflicts of interest, personal account dealing, trade body membership and so on)
- Building CCTV images
- Audio recordings of telephone interviews
- Notes from face to face interviews
- Reporting and managerial relationships
- Photograph(s)