

Demica Limited and Demica Finance Limited - Applicant Data Protection Notice

This Data Protection Notice aims to give job applicants of Demica Limited and Demica Finance Limited (together, “**Demica**”) information on how their personal data (i.e., information which directly or indirectly identifies an applicant) are processed by Demica when they apply for a role or vacancy with Demica. For the purposes of data protection laws in the UK, Demica is the data controller of applicants’ personal data.

Data That May Be Collected. Demica may collect certain personal data with respect to applicants including, without limitation:

- (i) **contact information** (e.g., name, home and business address, phone numbers, email addresses, emergency contact information);
- (ii) **personal information** (e.g., date of birth, visa details, nationality);
- (iii) **employment and education history** (including references); and
- (iv) **any other information which may be voluntarily disclosed** to Demica by the applicant in the course of the application process.

Where Demica carries out background checks on applicants, this may involve the processing of criminal record data and this will only be processed where such processing is specifically authorised or required by law.

If an applicant applies for a role with Demica and fails to provide information when requested which is necessary for Demica to consider the application, Demica may not be able to: (i) process the application successfully; or (ii) comply with applicable legal obligations.

Purposes and legal basis for processing of applicant personal data. Demica may process applicant personal data for the purposes set out below:

Categories of Personal Data	Purpose	Lawful Basis
Contact information, personal information, employment and educational history	Making a decision about the applicant’s recruitment or appointment, including the right to work	This is necessary to enter into a contract with the applicant (Article 6(1)(b), UK GDPR) We have a legal obligation to do so (Article 6(1)(c), UK GDPR)
Contact information, personal information, employment and educational history	Managing the recruitment process, including assessing the applicant’s skills, qualifications and suitability for the role	We have a legitimate interest to ensure that we appoint a suitable and qualified applicant to the relevant Demica role (Article 6(1)(f), UK GDPR) This is necessary to enter into a contract with the applicant (Article 6(1)(b), UK GDPR)

Contact information, personal information, employment and educational history	Maintaining records regarding the recruitment process	We have a legitimate interest to ensure that we maintain accurate and comprehensive records regarding the recruitment process (Article 6(1)(f), UK GDPR) We have a legal obligation to do so (Article 6(1)(c), UK GDPR)
Contact information	Communicating with the applicant, recruitment agents and other vendors and business associates	We have a legitimate interest to ensure that we communicate promptly and effectively regarding the recruitment process with the applicant (Article 6(1)(f), UK GDPR)
Contact information, personal information, employment and educational history, any information as necessary to fulfil purpose	Carrying out audits and to investigate and resolve complaints, grievances or misconduct	We have a legitimate interest to manage our business (Article 6(1)(f), UK GDPR) We have a legal obligation to do so (Article 6(1)(c), UK GDPR)
	Preparing for and acting in relation to enquiries, investigations or proceedings, by governmental, administrative, judicial or regulatory authorities, including civil litigation	We have a legitimate interest to manage our business and to ensure that all investigations and proceedings are managed efficiently and effectively (Article 6(1)(f), UK GDPR) We have a legal obligation to do so (Article 6(1)(c), UK GDPR)
	Providing reasonable diligence material to a third party or meeting any disclosure obligations in connection with a potential asset or stock sale or acquisition or reorganization of Demica	We have a legitimate interest to manage our business (Article 6(1)(f), UK GDPR)
	To respond to data subject requests	We have a legal obligation to do so (Article 6(1)(c), UK GDPR)
Data concerning criminal convictions and offences		
Contact information, criminal convictions and offences data	To comply with regulatory obligations for designated functions and to ensure all	We may have a legitimate interest to determine whether an applicant is suitable for a particular role in the

	staff are fit and proper to perform their relevant roles	organisation (Article 6(1)(c) and (f) and 10, UK GDPR)
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Applicants have a right to object to processing of their personal data where that processing is carried out for Demica’s legitimate interest.

Disclosure to Certain Third Parties. Demica may disclose certain applicant personal data for the above purposes to the following recipients: (i) to its affiliates, service providers (e.g., IT service providers, background check providers), sub-contractors, consultants and advisors; (ii) other parties to a transaction on a need to know basis; (iii) to fraud prevention agencies and law enforcement agencies; (iv) to tax authorities, courts, governmental and non-governmental regulators and ombudsmen; or (v) as required or permitted by law, including to comply with a subpoena or similar legal process or government request, or when Demica believes in good faith that disclosure is legally required or Demica has a legitimate interest in making a disclosure, such as where necessary to protect Demica’s rights and property.

Transfer of Personal Data Outside the UK. Demica may disclose applicants’ personal data for the above listed purposes to recipients located in countries outside of the UK, including in the U.S., and which may not have data protection laws equivalent to those in the UK. In such a case, Demica will take steps to ensure that the personal data is protected including entry into Standard Contractual Clauses (“SCCs”) with the recipient, seeking assurances from the recipient that they have Binding Corporate Rules in place or otherwise relying on a derogation for the transfer (e.g., where the transfer is necessary for the defense of legal claims). You can request further information on the data transfer solutions relied upon, including a copy of the SCCs by using the contact details below.

Rights of Applicants. Under applicable data protection laws, applicants have the right to (subject to limitations and/or exceptions): (i) request access to and rectification or erasure of their personal data; (ii) obtain restriction of processing or to object to processing of their personal data; and (iii) ask for a copy of their personal data to be provided to them, or a third party, in a digital format. All such requests should be made using the contact details below. Applicants also have the right to lodge a complaint about the processing of their personal data with the UK’s Information Commissioner’s Office.

Security and Retention. Demica will take steps to implement reasonable technical and organisational measures to protect applicants’ personal data against loss or theft, as well as from unauthorised access, disclosure, copying, use or modification, regardless of the format in which it is held. Applicants’ personal data are retained for twelve (12) months from the end of a recruitment exercise, except if retained for potential future roles (with an applicant’s agreement), in which case, such retention shall be reviewed on a three-yearly basis. Where an application is successful, the personal data gathered during the recruitment / application process will be transferred to your personnel file and retained during the course of your relationship with Demica. The periods for which your personal data will be held in these circumstances will be provided to you in a new data protection notice.

Enquiries, Requests or Concerns. All enquiries, requests or concerns regarding this Data Protection Notice or relating to the processing of applicant personal data including all requests as detailed in the Rights of Applicants section above, should be sent to careers@demica.com.