

# Recruitment Privacy Notice

Welcome to Morses Club PLC and its subsidiary, Shelby Finance Ltd.

As a prospective employee of either Morses Club PLC or Shelby Finance Ltd, please take the time to read and understand this privacy notice as it contains important information about the personal data we collect during the recruitment process and what we use it for.

We are committed to respecting your privacy and this notice explains how we may use the personal information we collect about you during our recruitment process. It also explains how we comply with the law on data protection and what your rights are. A separate and replacement privacy notice will be provided to you to cover your working relationship with us if we subsequently offer you employment.

Morses Club PLC is registered in England and Wales (Registration No 06793980) and our registered address Building 1, The Phoenix Centre, 1 Colliers Way, Nottingham, NG8 6AT

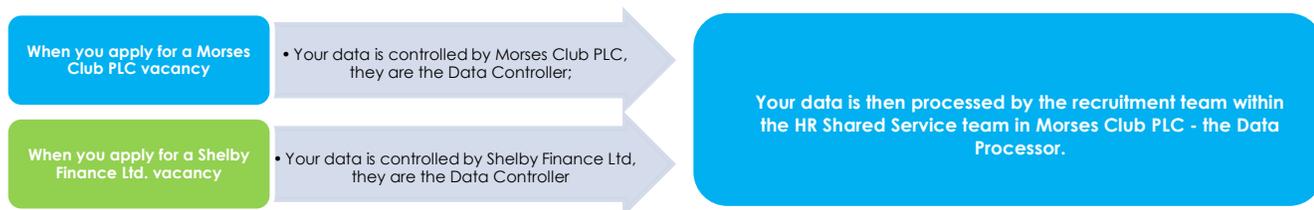
Shelby Finance Limited, a subsidiary of Morses Club PLC, is registered in England and Wales (Registration No 08117620) and our registered address is Building 1, The Phoenix Centre, 1 Colliers Way, Nottingham, NG8 6AT

**'Data Controller'** is a legal phrase used to describe the person or entity that controls the way information is used and processed.

Under the General Data Protection Regulations (GDPR) Morses Club PLC is the 'Data Controller' for the information you provide when you apply for a job with **Morses Club PLC**.

Shelby Finance Ltd is the 'Data Controller' for the information you provide when you apply for a job with **Shelby Finance Ltd**.

Morses Club PLC provide Shelby Finance Ltd with HR services, therefore if you have applied for a Shelby Finance Ltd vacancy, Morses Club PLC will be classed under legislation as a 'Data Processor' and will administer your application and on-boarding, including appropriate background checks.



The purpose of the Privacy Notice is to explain how we manage and process your data. The contents within the remainder of the notice applies consistently, irrespective of the role you have applied for.

Our Data Protection Officer oversees our compliance with data protection laws and if you are unhappy with the way we have handled your data at any time you will find details of how to contact them in the **"Contacting us"** section at the end of this privacy notice.

## Personal Information

We collect a range of personal information about you when you apply for a role with us during the recruitment process including your:

- contact details (e.g. name, title, address, contact telephone numbers and email addresses);
- date of birth;
- diversity information, e.g. gender, nationality;
- details of your current and previous employment including, location, job title, key achievements, start and leaving dates;
- academic qualifications, training records and professional memberships, if applicable and relevant to the role applied for, and
- for some roles whether you have a valid UK driving licence
- other information you choose to share with us in your application. For example the reasons you believe you are the right person for the job

If we subsequently offer you a job with us, we will also collect additional information to enable us to set you up on our systems and fulfil our contractual and legal obligations in relation to your employment. For example, we may collect:

- your national insurance number
- details of your marital status and dependants, next of kin and emergency contact details
- referee details
- driving licence details (including copies where we are required to hold such information for identification or insurance purposes where you are required to drive on company business)
- details of your vehicle insurance where it is agreed that you will drive your own vehicle on company business
- copies of identification documents such as passport, utility bills, identity cards, etc
- details of criminal convictions (including driving convictions)
- credit history

Whenever we collect personal information from you we will always aim to make it clear whether it is necessary for you to provide it or whether it is optional, but if you are unsure at any time please ask.

## Special Category Personal Information

We may also collect, store and use “special categories” of more sensitive personal information about you during the recruitment process. This includes information about your:

- race or ethnicity, religious beliefs, sexual orientation and political opinions;
- trade union memberships; and
- health, including any medical condition, health and sickness records, medical records and health professional information and disability information

We may not collect all the above types of special category information about you, however where we do collect such information, we do so on the basis that it is necessary for:

- reasons of substantial public interest, on a lawful basis;
- the establishment, exercise or defence of legal claims;

- 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**
- you have given your explicit consent to this information being processed.

You are not under any obligation to provide us with any of your personal information, and you do not have to agree to any request for consent from us. However, if you choose not to provide information or you withdraw your consent this may prevent us from processing your application further or confirming an offer of employment.

If you have given consent to use your personal information in a particular manner, you have the right to withdraw this at any time. If you decide to do this it will not affect any use of the data made before you withdrew consent and we may still be entitled to hold and process the relevant personal information if we are entitled to do so on bases other than your consent (e.g. where we have a legal obligation to do so).

If you wish to withdraw your consent you can login to our recruitment system at any time and remove the data you do not wish us to process or, if you no longer wish us to progress your application, you can close your account. If you have any problems doing this, need advice about how removing some or all of your data will affect our ability to progress your application or simply need additional help please contact [careers@morsesclub.com](mailto:careers@morsesclub.com) or [ShelbyCareers@shelbyfinance.com](mailto:ShelbyCareers@shelbyfinance.com)

### Data Collection and Usage

We typically collect personal information from you during the application and recruitment process, using our online recruitment system as this allows us to process your information securely and efficiently. We also collect additional information from third parties including your former employers, organisations you have worked for, credit reference agencies or other background check agencies. We may also collect personal information from an employment agency, online recruitment platforms, public information on social media platforms or work-related online platforms such as LinkedIn.

You should note that if, as part of the application and/or the recruitment process, you provide us with details of referees, next of kin, beneficiaries, family members and emergency contacts, it is your responsibility to ensure you have their permission to provide us with this information as they also have a right to know and to be aware of what personal information we hold about them, how we collect it, how we use and how we may share that information.

They also have the same rights as set out in the "Your rights in relation to personal information" section.

The main purposes for which we collect your personal information during the recruitment process, the categories of information we use for each purpose and our lawful basis for collecting and processing it are set out in the table below.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
We want to keep you informed of the progress of your application during the recruitment process.	Your contact details	We need this information to be able to perform and administer the recruitment process
We would like to be able to make reasonable adjustments during the selection process if you have a disability	Your personal information including some special category information	We have a legal obligation to make reasonable adjustments for candidates who have a disability.

<p>We need to assess your skills and experience and to make decisions about your suitability for employment</p>	<p>Your personal information including driving licence status and some special category information</p>	<p>We have a legitimate interest to run and manage our business and to ensure that our workers are suitably qualified, experienced and trained.</p> <p>We have a legal obligation to ensure that we have identified and assessed potential risks if we employ someone with a criminal record or adverse credit history.</p> <p>Processing of sensitive personal information such as criminal records and credit history is only undertaken with your consent; however you should be aware that if you do not give your consent, or if you later withdraw your consent to us processing this information, we may not be able to offer you a role with us, or to confirm an offer made earlier in the process.</p>
<p>We need to check you are legally entitled to work in the UK</p>	<p>Personal contact details, identification documents and right to work documentation</p>	<p>We have a legal obligation to do so.</p>
<p>We need to comply with health and safety obligations</p>	<p>Your personal contact information; records of the date / times you attended our premises during the recruitment process; special category information (medical history and information)</p>	<p>We have a legal obligation to comply with Health and Safety laws</p> <p>If you are driving on company business, we have a legal obligation to ensure that you have a valid UK driving licence and we may have an obligation to be aware of any notifiable medical conditions you have</p>
<p>We'd like to keep you informed of future opportunities to work for us if you would like us to</p>	<p>All of the personal information we collect about you (excluding criminal records and credit history) information</p>	<p>We will inform you of future career opportunities if you have confirmed you wish to be part of our talent network.</p>
<p>To deal with legal disputes involving you, or other employees, workers, directors and consultants, including accidents that may arise during or as a result of the recruitment process</p>	<p>All your personal information including 'special categories' of personal information</p>	<p>We have a legitimate interest to ensure that all legal and personal injury claims are managed effectively.</p> <p>We have a legal obligation to ensure our recruiting practices are non-discriminatory and to provide reasonable adjustments in the case of disability.</p>
<p>To undertake statistical analysis so that we can improve the effectiveness of our recruiting processes and</p>	<p>Application or rejection records and special category information</p>	<p>We have a legitimate interest in order to maintain our employer brand.</p>

ensure we have a diverse workforce		We have a legal obligation to ensure our recruiting practices are non-discriminatory
So that we can carry out equal opportunities monitoring	Special category information	<p>We have a legal obligation to ensure our recruiting practices are non-discriminatory.</p> <p>Special category information collected via e-apply and you provide this by consent. Your data is anonymised at the point of collection and stored against the vacancy you have applied for.</p>
To keep appropriate records of applications for our recruitment process	All personal information; special categories of information; driving licence and sensitive personal information such as criminal records and credit history checks.	<p>We have a legal obligation to ensure our recruiting practices are non-discriminatory.</p> <p>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</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above. This data is collected and stored anonymously and tagged to the vacancy in our applicant tracking system.</p> <p>We process criminal records, credit history and driving licence checks on the basis of legal obligations or based on your explicit consent.</p>
For the purpose of complying with any regulatory requirements	All the personal information including criminal records, credit history and driving licence information and checks	<p>We may have a legal obligation to comply with regulatory requirements, and we have a legitimate interest in complying with regulatory requirements</p> <p>We process criminal records, credit history and driving licence checks on the basis of legal obligations or based on your explicit consent.</p>
We may use information about your physical or mental health to check whether we can provide you with benefits under your proposed contract	Special category information: about your health, including any medical condition, health and sickness records, medical records and health professional information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above

<p>We will use and retain information about criminal convictions to comply with law and in order to determine your eligibility to undertake particular types of work.</p>	<p>Information about your criminal convictions and offences (including driving offences)</p>	<p>For criminal records information we process it on the basis of legal obligations or based on your explicit consent.</p>
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## Who we share your personal information with

During our recruitment process your information may be shared with:

- the provider of our online recruitment system (E-Ploy Ltd) but only for the purposes of providing their services to us.
- Subsidiary/Parent Companies if your application is relevant for other roles across the group.
- Your recruitment agency(s) or consultant(s) (where applicable) 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 e.g. IT service providers
- 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 (ICO) or the Financial Conduct Authority (FCA).
- 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.**

Please note that the contractual arrangements we have in place with all of our third-party service providers require them to take appropriate security measures to protect your personal information.

## Transferring your personal information internationally

We will not transfer your data out of the European Economic Area (EEA) or to any country that has been deemed (by the Information Commissioners Office) to have inadequate data protection controls.

## How long we keep personal information for

We keep records of the number of applications, withdrawn applications, interviews and hires for each recruitment campaign so that we can improve our targeting in the future. We also keep anonymised special category information for each vacancy so that we can undertake equal opportunities monitoring and statistical analysis to help us attract a diverse workforce

On applying for a vacancy and registering your personal details you consent to our Company collecting, storing and processing your data in accordance with this privacy notice for a period of no less than 12 months. You may withdraw your consent or update your details at any time, with the exception of the exclusions outlined below.

For legal reasons we may be required to provide detailed information about all applicants for a specific role. Because of this, if you have applied for a vacancy, we will keep your information for 12 months after the vacancy you applied for is closed.

## Your rights in relation to personal information

You have the following rights in relation to your personal information, these are the right to:

- be informed about how your personal information is being used;
- access the personal information we hold about you;
- request the correction of inaccurate personal information we hold about you;
- request the erasure of your personal information in certain limited circumstances;
- restrict processing of your personal information where certain requirements are met;
- object to the processing of your personal information;
- request that we transfer elements of your data either to you or another service provider; and
- object to certain automated decision-making processes using your personal information.

Some of these rights, e.g. 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 there are specific requirements and exemptions which apply to these rights (however some have no conditions attached for example, your right to withdraw consent or object to processing for direct marketing are absolute rights).

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

Please note that 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 an appropriate security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office, however we are here to help and encourage you to contact us to resolve your complaint first.

## Changes to this notice

We regularly review the ways in which we use personal information during our recruitment processes and this means that we may update this privacy notice from time to time. If we change this notice in a material way, we will place an announcement at the top of this page. For significant changes to this notice we will 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.

## Contacting us

If you would like more information about any part of this privacy notice, or you have a query or complaint in connection with the information we hold about you, please email [dpo@morsesclub.com](mailto:dpo@morsesclub.com) or write to Data Protection Officer, Building 1, The Phoenix Centre, 1 Colliers Way, Nottingham, NG8 6AT.