

Freetrade Recruitment Privacy Policy

Last updated: 15/03/2022

This policy tells you how we look after your personal data when you apply for a job with us and take part in our recruitment process. It sets out what information we collect about you, what we use it for and who we share it with. It also explains your rights and what to do if you have any concerns.

We may sometimes need to update this notice, to reflect any changes to the way Freetrade manages its day-to-day activities or to comply with new legal requirements. We will notify you of any important changes before they take effect, and the latest version is always available on request.

1. Who we are and other important information

We are Freetrade Limited, registered in England and Wales with company number 09797821 with our registered address at 10 Devonshire Square, London, England, EC2M 4YP (**Freetrade, we, us or our**).

Freetrade is the **controller** for your information (which means we decide what information we collect and how it is used).

Where we have received your application through a recruitment agency or another company (e.g. a consultancy firm) we act as independent controllers for your information (which means Freetrade and the other company separately decide how your information is used and use it for different reasons).

2. Contact details

If you have any questions about this privacy policy or the way that we use information, please contact privacy@freetrade.io

3. The information we collect about you

Personal data means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect and where we receive it from below:

Type of Personal Data	Received from
 Identity Data – name, title, date of birth, job title, gender, emergency contact name and their relationship to you, passport, driving licence	<ul style="list-style-type: none">• you• recruitment agency (if applicable)

	<p>Contact Data – personal email address, telephone numbers, home address</p>	<ul style="list-style-type: none"> • you • recruitment agency (if applicable)
	<p>Recruitment Data – copies of right to work documents, interview notes, information you provided in your CV or cover letter as part of the application process, result of due diligence checks</p>	<ul style="list-style-type: none"> • you • recruitment agency (if applicable) • your references • background checks
	<p>Employment and Qualification Data – current and/or previous job titles, work history, working hours, training records, professional memberships</p>	<ul style="list-style-type: none"> • you • recruitment agency (if applicable) • external training providers
	<p>Feedback – information and responses you provide when completing surveys and questionnaires</p>	<ul style="list-style-type: none"> • you
	<p>Photo and Image Data – profile picture, images, videos and audio (e.g. video calls), CCTV footage</p>	<ul style="list-style-type: none"> • you • external security providers
	<p>Sensitive Data – information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life or sexual orientation, trade union membership and/or information about criminal convictions and offences</p>	<ul style="list-style-type: none"> • you • background checks
	<p>Technical & Usage Data - internet protocol (IP) address, browser type and version, time zone setting and generic location, browser plug-in types and versions, operating system and platform on the devices you use to access Freetrade systems. Information about how you use Freetrade systems.</p>	<ul style="list-style-type: none"> • you (via cookies and similar technologies)

We may **anonymise** the personal data we collect (so it can no longer identify you as an individual) and then combine it with other anonymous information so it becomes **aggregated data**. Aggregated data helps us identify trends. Data protection law does

not govern the use of aggregated data and the various rights described below do not apply to it.

4. How we use your information

Freetrade is required to identify a legal justification (also known as a **lawful basis**) for collecting and using your personal data. There are six legal justifications which organisations can rely on. The most relevant of these to us are where we use your personal data to:

- to enter into and perform our **contract** with you (if we offer you a job with us);
- pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy);
- comply with a **legal obligation** that we have; and
- (in very rare circumstances) to protect yours or another person's **vital interests** (e.g. disclose medical information to an attending paramedic, inform your nominated emergency contact)
- do something that you have given your **consent** for.

The table below sets out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed in the table, we will update our personnel privacy policy and notify you.

Purposes	Justification
<p>Complying with our legal obligations as your potential employer when carrying out background checks and our recruitment process. For example, if we invite you for an interview on our premises:</p> <ul style="list-style-type: none"> • checking you are legally entitled to work in the UK • ascertaining your fitness to work • complying with our health and safety obligations • making any required reasonable adjustments 	<p>Legal obligation</p>
<p>Taking steps to enter into a contract with you (if we offer you a job with us):</p> <ul style="list-style-type: none"> • determining the terms on which you work for Freetrade • administer any employee benefit schemes we offer 	<p>Performance of contract</p>

<ul style="list-style-type: none"> • paying you 	
Asking you to participate in surveys and other types of feedback.	Consent
In emergency circumstances, to ensure the wellbeing of a member of staff or another person.	Vital interests
Monitoring physical presence at premises (e.g. sign in at reception, CCTV footage at key entry points to third party offices we use) if, for example, we invite you for an in-person interview. Note that candidates and employees are not otherwise monitored using CCTV, and we only request access to CCTV footage where necessary (see justification).	Legitimate interests (necessary to investigate allegations of behaviour that contravenes Freetrade policy)
Dealing with legal disputes involving you.	Legitimate interests (necessary to defend legal claims)

5. When we use sensitive personal data about you

Where we use personal data about you that is very sensitive (such as medical information, information about your sexual orientation or criminal conviction and offence information), we may require a second legal reason to use your personal data.

In applying for a job with us this is likely to occur where:

- the processing is justified under UK law and the law allows us to use your data for a particular purpose (for example, we may need to use your medical data to ensure that we can meet the standards required in relation to health and safety at work or to make reasonable adjustments to ensure that we can comply with the Equality Act 2010); or
- where you have provided your express consent for us to do so (for example, where you provide us with sensitive personal data to help us with our diversity monitoring).

6. Who we share your information with

We share (or may share) your personal data with:

- **Freetrade personnel:** Freetrade employees (or other types of workers) who have contracts containing confidentiality and data protection obligations, such as during the interview process where various Freetrade employees might be involved.

- **Your recruitment agency:** where we receive an application from a recruitment agency on your behalf. We always have a contract in place with other organisations containing confidentiality and data protection obligations.
- **Our suppliers:** other organisations help us manage Freetrade infrastructure. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations.
- **Regulatory authorities:** such as HM Revenue & Customs.
- **Our professional advisers** such as our accountants or legal advisors where we require specialist advice to help us conduct our business.
- **Any actual or potential buyer of the business.**

7. Where your information is located or transferred to

We will only transfer information outside of the UK where we have a valid legal mechanism in place (to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located, e.g. by using contracts approved by the European Commission or UK Secretary of State).

If you access our systems whilst abroad then your personal data may be stored on services located in that country.

8. How we keep your information safe

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication (including multi-factor authentication)
- asset management (including anti-virus, device management and inventories)
- network security (including intrusion detection and DNS security)
- secure software development (including guidelines, training, design reviews, change management and vulnerability management)
- logging and monitoring (including logging of critical data, protection of logs, integrity monitoring and open source intelligence)
- business continuity and disaster recovery processes

If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law).

9. How long we keep your information

Where we act as the controller, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To decide how long to keep personal data (also known as its **retention period**), Freetrade considers the volume, nature, and sensitivity of the personal data, the potential risk of harm to you if an incident were to happen, whether we require the personal data to achieve the purposes we have identified or whether we can achieve those purposes through other means (e.g. by using aggregated data instead), and any applicable legal requirements (e.g. minimum accounting records for HM Revenue & Customs).

We usually keep personnel files for two years if a candidate is unsuccessful in our recruitment process, but we may extend this period in limited circumstances (e.g., if there has been a legal claim).

10. Your legal rights

You have specific legal rights in relation to your personal data. If you wish to exercise any of these rights, please email privacy@freetrade.io

It is usually free for you to exercise your rights.

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. If this happens we will always inform you in writing. We may charge a fee if we decide to proceed with a request that we believe is unfounded or excessive.

Your legal rights



Access: You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how Freetrade are using it to make sure we are abiding by the law.



Correction: You can ask Freetrade to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.



Deletion: You can ask Freetrade to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.



Restriction: You can ask us to restrict how we use your personal data and temporarily limit the way we use it (e.g. whilst you check that the personal data we hold for you is correct).



Objection: You can object to us using your personal data if you want us to stop using it. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.



Portability: You can ask us to send you or another organisation an electronic copy of your personal data.



Complaints: If you are unhappy with the way we collect and use your personal data, you can complain to the ICO or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage. You should speak to our recruitment team in the first instance.