



Sequel EU Candidate Applications & Recruitment Privacy Notice

1. Background

This privacy notice details how we handle the information we learn about you when you apply for a job with us. This privacy notice applies to personal data processed as part of the application, interviewing and recruitment processes by or on behalf Sequel Business Solutions Ltd (“Sequel”) as a data controller.

Protecting the privacy and personal data of Sequel job candidates is of utmost importance to us. It is a key consideration in the way we create, organise and implement our business, both on-line and off-line.

2. Changes to this Privacy Notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to regularly check our website for changes to our privacy notice.

3. Our Data Protection Representative

You can contact our Data Protection Representative per the instructions set forth in Section 16 below.

4. What kinds of information about you do we process?

Sequel will collect personal data from you in circumstances where you provide personal data to us by applying directly for a job role, through information that we learn about you through your interactions with us such as speculative applications, or with third parties such as employment agencies, websites and other media designed for career and business professionals to connect. We may also collect personal data about you from third parties, including for example when a referee provides us with information about you, or where you have made your personal data publicly available for the purposes of recruitment, such as on job boards, LinkedIn or other publicly available databases.

If you apply to us for a job, either directly or through a recruitment agency, we collect and store the personal data that we receive as part of the application, interviewing and recruitment process.

Sequel collects and uses personal data such as:

- **Personal details:** name, address, contract telephone numbers and e-mail address,
- **Information included in your CV and covering letter:** such as job history, academic background, skills and competencies, personal interests, languages spoken and reference information.
- We process limited amounts of special categories of your personal data such as ethnicity or gender for diversity purposes or health/medical information in order to accommodate a disability or illness.
- Information required for background checks which will vary according to the role.

5. What do we use your information for?

We will process this data, subject to applicable law in so far as it is necessary to deal with your application as follows:

- **Management of the recruitment process:** activities carried out in the course of receiving and assessing candidate applications including CV consideration, communicating with you, administration, the

interview process, and reviewing employment decisions. We process personal data for these purposes on the basis that it is necessary for our legitimate interests in managing and administering our recruitment process.

- **Assessment:** activities carried out to assess candidate suitability for roles. This may involve psychometric testing (such as a personality test), interview (including face to face, telephone or video), behavioral assessments (such as, group exercise or presentation) and technical assessments. We process personal data for these purposes on the basis that it is necessary for our legitimate interests in managing and administering our business or because we are required to do so by law.
- **Legal and compliance:** compliance with legal and other requirements, such as tax, record-keeping and reporting obligations, physical access policies, compliance with requests from government or other public authorities, responding to legal process such as subpoenas and court orders, pursuing legal rights and remedies, defending litigation and managing any complaints or claims, conducting investigations and complying with internal policies and procedures. We process personal data for these purposes on the basis that we are required to do so by law or it is necessary for the establishment, exercise or defence of legal claims.
- **Sensitive information:** During the process we may also collect certain types of sensitive personal data where this has been provided or made publicly available by you or can be inferred from your CV and for specific purposes, including: the collection of health/medical information in order to accommodate a disability or illness, or in order to comply with health and safety law obligations; diversity-related personal data (such as gender, race or ethnicity). We do not collect your sensitive personal data unless we are required or permitted to do so by applicable law, or you have, in accordance with applicable law, provided your explicit consent.
- **Background checks:** We may also process certain of the personal information that you give to us to perform background checks which may include criminal, credit, academic, work history and identification checks. Such checks will only be carried out after prior notification to you and the information requested will depend on the particular check.

6. Protection of your information

We intend to protect the quality and integrity of your personal data. We have implemented technologies and security policies to protect the stored personal data of our users from unauthorised access, improper use, alteration, unlawful or accidental destruction and accidental loss. We will continue to enhance our security procedures as new technology becomes available. Our employees and processors who have access to personal data are contractually obliged to respect the privacy of our visitors and the confidentiality of their personal data.

7. When do we share your information with other organisations?

Sequel may share your personal data with:

- Other Verisk entities; and
- Entities that provide/process: pre-employment background checks, candidate assessments and security. In accordance with applicable law, we have entered into legally binding agreements requiring them to use or disclose personal data only as necessary to perform services on our behalf or comply with applicable legal requirements.

In addition, we may disclose personal data about you (a) if we are required or permitted to do so by law or legal process, for example due to a court order or a request from a law enforcement agency, (b) when we believe

disclosure is necessary or appropriate to prevent physical harm or financial loss, (c) in connection with an investigation of suspected or actual fraudulent or other illegal activity, and (d) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

8. How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details shown in Section 16 below.

9. Is your information transferred outside the EEA?

Your personal data may be disclosed to Sequel's affiliates or third parties either within or outside of the country from which it was collected. Some of your personal data may be transferred to a country (including the U.S.) that does not afford statutory protections for personal data equivalent to those within the country in which it was collected. If you are located in the European Economic Area ("EEA"), we will comply with applicable legal requirements providing adequate protection for the transfer of personal data to recipients in countries outside of the EEA and Switzerland. In all such cases Sequel will take steps designed to comply with applicable data protection law such as:

- The country to which the personal data will be transferred has been granted a European Commission adequacy decision;
- The recipient of the personal data is located in the U.S. and has certified to the EU-U.S. Privacy Shield Framework; or
- We have put in place appropriate safeguards in respect of the transfer, for example the EU Model Clauses.

You may request a copy of the safeguards that Sequel has put in place in respect of transfers of personal data by contacting us as described in the "Contact Us" section below.

10. What should you do if your information changes?

You should inform us promptly of any change to the details you submit via the website by sending details in writing to the details shown in Section 16 below.

11. Do you have to provide your information to us?

We may be unable to provide you with a full range of opportunities if you do not provide certain information to us. In cases where providing some personal data is optional, we'll endeavour to make this clear.

12. Do we do any monitoring involving processing of your information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information will only be shared for the purposes described above.

13. What about other automated decision making?

We do not make automated decisions about you using only technology, where none of our employees or any other individuals are involved.

14. For how long is your information retained by us?

Unless we explain otherwise to you, we'll hold your personal data based on the following criteria:

- For as long as we have reasonable business needs, such as managing our business, recruitment activities and relationship with you
- For as long as we provide information or assistance to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance.

15. What are your rights under data protection laws?

Subject to applicable law, you may have the right to request:

- confirmation of whether we process personal data relating to you and, if so, to request a copy of that data;
- that we rectify or update your personal data that is inaccurate, incomplete or outdated that we restrict the use of your personal data in certain circumstances;
- that we erase your personal data in certain circumstances, such as where we processed data based on our legitimate interests, where we collected personal data on the basis of your consent and you withdraw that consent;
- withdrawal of your consent where you have given us consent to process your personal data; and
- that we provide a copy of your personal data to you in a structured, commonly used and machine readable format in certain circumstances.

If you consider that we have processed your personal data in violation of applicable law and failed to remedy such violation to your reasonable satisfaction, you may also lodge a complaint with the data protection supervisory authority in your country.

16. Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights you can contact us by emailing legal@sequel.com. Alternatively, you can write to: Legal Department, Sequel Business Solutions Limited, Level 14, The Broadgate Tower, 20 Primrose Street, London, EC2A 2EW.