Data privacy notice for job applicants

Introduction

Aldermore Group PLC and its subsidiaries (including Aldermore Bank PLC and MotoNovo Finance Limited) (**"we", "us", "our"** or **"Aldermore"**) provide this Data Privacy Notice to make applicants for roles with us aware of our policy relating to the processing of their personal data.

This Data Privacy Notice sets out what personal data we will collect about you and the basis on which we will process it. It does not and will not form part of any contract that you may enter into with us. Please read the notice carefully to understand our practices regarding your personal data and how we will use it.

About Us

Aldermore is the data controller of the personal data of its applicants and is subject to applicable data protection laws.

Contacting us:

If you have any questions about this Data Privacy Notice or your information or wish to exercise any of your rights as described in this Data Privacy Notice or under applicable data protection laws, you can contact our Data Protection Officer:

Email: DPO@aldermore.co.uk

Address:

Data Protection Officer

Aldermore

4th Floor

40 Spring Gardens

Manchester

M2 1EN

Communication

Whilst processing your application we may contact you by email, text messaging, telephone or post.

What types of data are protected

Personal data

This Data Privacy Notice applies to the "personal data" of job applicants ("**you**" or "**your**"), that is any information relating to you as an identified or identifiable person.

Special categories of personal data

Within the broad range of information which can be personal data, the following are "special categories of personal data" which are subject to a greater degree of protection:

- physical or mental health
- racial or ethnic origin
- political opinions
- trade union membership
- religious or similar beliefs
- sexual life or sexual orientation
- genetic and biometric data

What information we collect

Information you give us or we collect about you

We ask for personal information from you in order to assist with our recruitment processes and to monitor recruitment statistics. This information may be stored electronically or as part of a paper filing system.

Information that we may collect includes, but is not limited to, the following:

- name;
- home address;
- contact details (such as telephone number and e-mail address);
- date of birth;
- gender;
- emergency contact details (which may also include personal data of next-of-kin, family or friends);
- your image in photographic form;
- copies of your passport, driving licence and similar documents;
- education history, training, qualifications, professional experience;
- current and past employment details (including job titles, salary and working hours);
- immigration status and work permits;

- languages spoken and level of proficiency;
- details of your referees;
- data we obtain from fraud prevention agencies (including Cifas); and
- other information given in your CV.

Special categories of personal data

We may also collect, store and use the following special categories of personal data which you supply us with:

- Information about your racial or ethnic origin, sex and sexual orientation, political opinions, trade union membership, religious or similar beliefs; and
- Information concerning your physical and mental health.

We will use this information for the purposes of carrying out our obligations as a prospective employer including monitoring of equality of opportunity, to assess suitability for particular jobs, to consider whether adjustments may need to be made to accommodate an applicant with a disability or in connection with establishing, defending and bringing legal claims. Where we process "special categories of personal data" we will ensure we are permitted to do so under data protection laws.

Data relating to criminal convictions & offences

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions in the following ways:

- to assess your suitability for a role; and
- to carry out statutory checks.

We will use your personal information in this way to comply with our legal, regulatory and corporate governance obligations and for our legitimate interests to prevent and detect criminal activity to ensure good employment practices. We have in place an appropriate policy and safeguards which we are required by law to maintain when process such data.

Information provided by third parties

Some of this information, and additional information, may be provided to us by recruitment agencies and external CV databases with which you have registered an interest.

We may also receive other information about you from organisations such as application management agencies, credit reference agencies, employment screening agencies fraud prevention agencies (including Cifas) and referees.

During the recruitment process we may also research information regarding your skills, experience or qualifications and information in the public domain including comments and opinions made public on social networking sites such as LinkedIn, Facebook and Twitter.

What we do with your information and on what basis

Any information about you which is obtained by us during the application process (whether obtained directly from you or from third parties such as your referees) may be stored and used by us for purposes including but not limited to:

- considering your suitability for employment or engagement;
- taking up your references;
- conducting appropriate background and other checks;
- where applicable, assessing your fitness and propriety for regulatory purposes;
- complying with our legal and regulatory obligations;
- carrying out identity checks, your right to work in the UK, anti-money laundering checks and checks with Fraud Prevention Agencies at the application stage. Where you have been introduced to us by an agency or other intermediary they may do these searches on our behalf]
- identifying links to any politically exposed persons, special interest persons, adverse media, or any financial sanctions, and to comply with our anti-money laundering obligations;
- negotiating and communicating with you in relation to your application and the terms of any offer that may be made to you;
- monitoring equal opportunities;
- dealing with requests by you to exercise your rights under data protection laws; and
- in connection with any legal issues.

Your information will not be used for other purposes without reference back to you, save as required by applicable law.

The legal basis for our processing of your personal data is based on the fact that you have applied to us for a position and it is necessary for us to process your data in order to consider your application for the purposes of our legitimate interests.

The legal basis for our processing of any special categories of personal data is for the purposes of carrying out our legal obligations as a prospective employer or, where necessary, for establishing, defending and bringing legal claims.

Disclosure of your information to third parties

For the purposes set out in “What we do with your information” above, your data may be shared with our managers and employees.

We may disclose your data to departments other than the one to which you may have originally applied to work if we think it is appropriate to do so for the above purposes.

The personal data we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal data will also be used to verify your identity. Further details of how your information will be used by Cifas, and your data protection rights, can be found by visiting the Cifas website where a copy of the full notice is available at www.cifas.org.uk/fpn. A copy of this is available on the intranet.

We may also disclose your data to other third parties where there is a legitimate reason to do so, or if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration;
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights; and
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We use automated processing at the application stage to assess your right to work in the UK. This means we attempt to match your personal details to publicly available information through sources such as the Royal Mail or Cifas. If for any reason we are unable to complete our formalities using this process you will be informed how you many complete the process using manual methods.

Security of your information

We are committed to ensuring that your information is safe and will take all steps reasonably necessary to ensure that such information is treated securely and in accordance with this Data Privacy Notice.

We limit access to your information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Unfortunately the transmission of information over the internet is not completely secure. Although we will do its best to protect information, we cannot guarantee the security of information transmitted over the internet, and any transmission is at your own risk.

How long we keep your information

If your application is successful, and you subsequently become employed or engaged by us, the data will become part of your personnel file and will be used in accordance with our employee Data Privacy Notice, a copy of which will be provided or made available to you.

If your application is not successful, we will store the personal data we collect about you for no longer than necessary for the purposes set out in this Data Privacy Notice and in accordance with our legal obligations and legitimate business interests.

To determine the appropriate retention period for such personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Further details on this can be obtained from our Data Protection Officer whose details are given above.

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on that ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- Request the transfer of your personal information to another party.

- Not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Exercising your rights

You can exercise any of your rights as described in this Data Privacy Notice and under applicable data protection laws by contacting us via the details given in the "Contacting us" box above.

Save as described in this Data Privacy Notice or provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing data or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

International transfers

As an international organisation, we may transfer your information to any country in which we operate. Therefore, it may be necessary to transfer your details to members of our group or third-party service providers located in countries that may not offer equivalent data protection or privacy laws to those in the UK. We may:

- transfer your data to our group entities based in South Africa; and

- store your data in servers based in Germany.

Under data protection laws, we can only transfer your personal data to a country outside the UK where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an '**adequacy regulation'**) further to Article 45 of the UK GDPR;

- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or

- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK, we do so on the basis of an adequacy regulation or (where this is not available) or an appropriate safeguard. Details

regarding these safeguards can be obtained from our Data Protection Officer whose details are given above. **Complaints**

If you have any query or concern about our use of your information, please contact our People Operations team.

You also have the right to complain to the Information Commissioner's Office ("**ICO**") (https://ico.org.uk/) about our data processing activities in relation to your personal data if you think they infringe applicable data protection laws. The ICO also has a dedicated helpline at 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Updates to this data privacy notice

We may amend or withdraw this Data Privacy Notice at any time at our sole and absolute discretion. It will not form part of any contractual documentation that we may enter into with you.

Date: December 2026