

Handling of Personal Data during the Application Process (Version 1.0)

SOF has appointed Jegor Tokarevich as its data protection officer. His role is to inform and advise the organisation on its data protection obligations. Jegor can be contacted at jegor.tokarevich@sof-ltd.com . Questions about this policy, or requests for further information, should be him.

SOF is registered with the Information Commissioner's Office (ICO) under the reference number ZA492132.

All our data processing activities are monitored by our appointed **Data Protection Officer** to ensure that the information we collect is:

- Used lawfully, fairly and in a transparent way
- Relevant and for reasons that we have told you about
- Accurate and up to date
- Kept only for as long as it is needed
- Kept securely

Information we collect from you

We only collect the information that we require to be able to find the best available opportunities and what is needed to assess your eligibility at different stages of our recruitment process.

This information may include and is not limited to the following details:

Personal data: Name, contact details, bank details, date of birth, gender, marital status, driving licence number, photographs, next of kin contact details, GP contact details.

Recruitment details: CVs, resumes, identification documents, educational records, work history, employment references and financial information.

Applications are managed via our online Applicant Tracking System (ATS) and additional information may be collected in writing or verbally to assist in the recruitment screening process and the interview stage.

We also collect information classed as 'special category data' related to your health, diversity information and details of any driving or criminal convictions.

Conviction Statement

It is important that you disclose any police related offences regardless of the date or country these occurred. Failure to disclose this information during the recruitment process could result in your application being withdrawn or rejected. We consider the nature of the offence, the time it occurred, your age at the time and any other relevant factors when deciding to process your application further.

Purpose for collecting and using your personal information

It is necessary to collect enough information to fulfil our legal and contractual duties during the recruitment process. If you are unable to provide us with the information required, this may result in our inability to fulfil our contractual obligations and termination of the recruitment process.

How we use your information

We use your information to match your skills and experience to a potential opportunity identified and in order to progress through the different recruitment stages outlined below:

- To carry out a fair recruitment process and make informed decisions throughout the selection process
- Screening of applicants to assess and shortlist candidates
- Interview and selection by hiring managers to determine suitability
- Conduct compliance and eligibility checks to ensure right to work
- Planning and delivery of training or assessments
- To provide and obtain employment references
- To communicate progress throughout recruitment process and/or offer of employment
- To demonstrate and record compliance with relevant laws
- To monitor operation and effectiveness of the recruitment process
- To communicate job alerts or similar opportunities

How long we keep your information

We will keep your information for audit purposes for 12 months after we confirmed that we won't proceed with your application. If you would like us to delete your data earlier than the end date of the 12 months period, please do reach out to us.

Sharing your information with others

We may share information with our recruitment teams and with our 3rd Party support providers to process your information throughout the recruitment process. Our

contractual agreements ensure that they maintain a duty of care with your personal information whilst providing:

- IT and telecoms support to ensure secure operation of our IT infrastructure; (specifically, Microsoft with the servers in the UK and bunker ltd operating from the UK)
- PeopleHR ATS software provider to process data, provide technical support and resolve issues
- Applicant screening service providers for DBS checks and eligibility to work in the UK (you will receive a separate GDPR notification when a screening service provider is appointed; all service providers are UK based)
- Individuals or organisations involved with the recruitment process and communications (UK based)

We will not share, sell or trade your personal information with any other third party without your consent, unless there is a legal reason to do so.

Data Security

We have appropriate organisational and technical security measures to protect your personal information and limit who has access. There are also appropriate safeguards in place for data transfers to protect your privacy rights.

We have procedures in place to detect and respond to suspected data security breaches. We may notify you and any relevant authority as part of our data risk management where we are legally obliged to.

Your rights

You have rights over the way we use your information:

- You have the right to be informed about what information we collect and how it is used as outlined in this privacy promise.
- You have the right to ask for access to the information we hold on you. We would usually provide copies free of charge.
- You have the right to ask us to correct or update any information you think is incorrect or incomplete.
- You have the right to object to your information being used and/or withdraw consent.
- You have the right to ask us to stop using your information. This 'right to be forgotten' is only applied where there is no legal reason for us to continue to hold or use it.
- You have the right to object to any automated decision making. This could affect your ability to fully access our services.

- You have the right to ask us to stop using your information for marketing purposes by opting out at any point of the registration process or by updating your preferences once registered. The unsubscribe feature on our emails are actioned immediately but may take up to 14 days to complete.
- You have the right to ask us to transfer certain personal information or a copy of some of your information to you or to another organisation, including service providers, in a format they can use where this is technically possible, known as the 'right to data portability'.
- You have the right to withdraw any permission you have previously given us to use your information.

For detailed information on each of those rights, including the circumstances in which they apply, see the Guidance from the Information Commissioner's Office (ICO) on individuals' rights under the UK General Data Protection Regulation. If you would like to exercise a right, please contact the Compliance team at gdpr@sof-ltd.com / Jegor.tokarevich@sof-ltd.com or see the 'how to contact us' section.

How to contact us

If you have any questions about this privacy promise, your rights or wish to contact the Data Protection Officer, get in touch by:

- **Email** – gdpr@sof-ltd.com / Jegor.tokarevich@sof-ltd.com
- **Post** – Substance Over Form Ltd., Jegor Tokarevich, 84 Eccleston Square, London SW1V 1PX
- **Telephone** – + 44 (0) 20 4522 9079