



PRIVACY POLICY – APPLICANTS AND PROSPECTIVE APPLICANTS

PayPoint is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

PayPoint Network Limited is a "data controller" for employees and applicants. This means that we are responsible for deciding how we hold and use personal information about you.

This notice applies to applicants and does not form part of any contract of employment, make an offer of employment or any other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how, when, where and why we are using such information. This notice may contain link to other documents. If you cannot access a link for any reason and wish to see the document please use the contact details on the website.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

HOW WE WILL USE YOUR INFORMATION

If you send us your personal data or upload it to a portal we can use this personal data to;

- Review your application and assess your suitability for the role.
- Contact you for more information to help us with your application.
- Share your personal data with other companies within the PayPoint Group in relation to your application.



If your application is successful and you are offered a position we may in the future;

- Conduct such checks as are reasonably required including credit checks, DBS checks or similar commensurate to the role or function.
- Request information as to ethnic origin and/or disability for reporting and compliance purposes.
- Disclose personal data to your third party service provider VERIFILE to complete identify verification.
- Contact your referees.
- Confirm your employment, skills and education details are accurate.

AUTOMATED DECISION-MAKING

We may use certain tools to assist us to make decisions. However, we do not use automated decision making procedures as all systems are subject to our own review.

DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

TRANSFERRING INFORMATION OUTSIDE THE EU

From time to time we may need to transfer the personal information we collect about you to the following outside the EEA.

However, we will ensure that any transfer is in accordance with the data protection laws and provides adequate protection to your personal data.

Third party service providers and other such organisation may be located outside the EEA.

DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.



We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

Details of retention periods for different aspects of your personal information are available in our retention policy subject to regulatory and legislative controls is 5 (five) years.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an applicant we will retain and when appropriate securely destroy your personal information in accordance with applicable laws and regulations.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations. Sometimes, we may have use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

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.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

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 continuing 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.

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 this 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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact HR in writing.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such certain limited circumstances.

WHAT WE MAY NEED FROM YOU

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

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact privacy@paypoint.com.

DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the HR or the DPO. The DPO's details are below:

Data Protection Officer
PayPoint Group
1 The Boulevard
Shire Park
Welwyn Garden City
Hertfordshire
AL7 1EL

e-mail: privacy@paypoint.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.



CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

PAYPOINT UK Companies

PayPoint Plc

PayPoint Network Limited

PayPoint Collections Limited

PayPoint Retail Solutions Limited

PayPoint Payment Services Limited

PayPoint Trust Managers Limited

-0-0-0-0-0-0-0-0-0-0-0-0-0-

Document Management

Revised: 25 May 2018

Version: 1.0

Author: Data Protection Officer