

Candidate Data Protection Notice

As part of our candidate application and recruitment activities we collect, store and use personal and special categories of data which may directly or indirectly identify you (“personal information”). The purpose of this notification is to set out the principles governing 3i’s use of your personal information.

For the avoidance of doubt, 3i means 3i Group plc and any of its subsidiaries and related companies. The 3i company that you have dealings with is the controller of your personal information.

3i is committed to following policies that protect your privacy and comply with current UK and applicable European data protection laws and regulations in respect of personal information. 3i will only obtain personal information about you for specified and lawful purposes and any personal information which 3i obtains will be processed fairly and lawfully.

We process personal information for a range of purposes relating to general recruitment activities as well as the recruitment process and this may include your application, assessment, pre-employment screening and your right to work.

The kind of information we hold about you

YOUR PERSONAL INFORMATION

We will collect, store, and use categories of personal information about you, including:

- Personal details such as name, address, email address and date and place of birth;
- Work history/job data: previous employers, positions, dates, etc.;
- Compensation: basic salary, benefits, bonuses, etc.;
- Education and work history including professional qualifications and skills;
- Employer feedback / references, including regulatory references where necessary;
- Nationality, visa and right to work information (e.g. passport, driving licence, National Insurance number);
- Photographs;
- Results of pre-employment screening checks (e.g. credit history, criminal records checks); and
- Assessment results and notes (e.g. psychometric assessment results, results from video or telephone assessment and interview notes).

YOUR SENSITIVE / SPECIAL CATEGORY INFORMATION

During the recruitment process we may also inadvertently capture some special categories of personal information about you (e.g. information relating to your racial or ethnic origin, religious or philosophical beliefs, trade union membership, physical or mental health or condition, sexual orientation), where this has been provided or made publically available by you or can be inferred from your CV.

We may also process certain special categories of information about you (e.g. information about a physical or mental health or condition) in order to make reasonable adjustments to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting at 3i (if successful) and to ensure that we comply with regulatory obligations and expectations placed on us with regard to our recruitment.

We may also process information relating to criminal convictions and offences (e.g. as part of pre-employment screening checks). We will only process special categories of information or information about criminal convictions and offences where permitted by applicable laws or where we have obtained your explicit consent.

How is your personal information collected?

Generally, we collect personal information directly from you in circumstances where you provide personal information to us by applying directly for a role at 3i, or information that we learn about you through your interactions with us, or with third parties (e.g. recruitment agencies). We may also collect personal information about you from third parties, including, for example, when a referee provides information about you, when a colleague recommends that we consider you for a position or from other sources where you have made your personal information publically available for the purposes of recruitment on jobs boards, LinkedIn or other publically available social media networks and databases.

We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily because it is in the legitimate interests of 3i to process your personal information in the administration of your application and for general recruitment purposes and to enable us to comply with our legal and regulatory obligations. As noted above, during the course of your application it may also be necessary for 3i or its suppliers to process special categories of information about you where permitted by applicable laws or where we have obtained your explicit consent.

The situations in which we will process personal information include those listed below.

- **Application:** activities carried out in the course of receiving and assessing candidate applications, including reviewing general applications or applications for specific jobs and processing information to enable subscription to our job alerts;
- **Assessment:** activities carried out in the course of assessing candidate suitability for roles at 3i;
- **Decision making:** making a decision about your recruitment or appointment, determining the terms on which you work for us;
- **Pre-employment screening:** pre-employment screening activities carried out for the purposes of financial, credit history and insurance risk assessments; criminal records checks; county court judgements checks, adverse media checks, screening against external databases and sanctions lists to establish connections to politically exposed persons;
- **Candidate searches:** in the course of our search activities, we use personal information that we have collected concerning candidates to identify professional opportunities that we think may be of interest. We may contact potential candidates from time to time regarding such opportunities. We may also contact individuals from time to time to solicit names of, or other personal information regarding, potential candidates in connection with a search that we are conducting and for purposes of market intelligence;
- **General:**
 - Market research activities and specific or speculative recruitment-related activities;
 - Equal opportunities monitoring;
 - Complying with health and safety obligations;
 - To prevent fraud; and
 - To comply with our legal and regulatory obligations and expectations as a listed, regulated group, to report to regulators and to perform monitoring and audit work.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Information about criminal convictions and offences

Given the nature of our business, we have legal and regulatory obligations and expectations to ensure that the people we employ can be relied upon to deal with client assets and information responsibly. We therefore ask questions about any prior civil or criminal proceedings you may have been subject to and may also conduct criminal record checks.

Regulatory screening

In order to comply with our legal and regulatory obligations in relation to anti-money laundering and sanctions restrictions, we will screen your name against global sanctions lists. The screening will simply involve searching third party databases to ensure you are not on a sanctions list. We are not able to employ anyone on a sanctions list.

In addition, in order to comply with our legal obligations in relation to anti-bribery and corruption and US restrictions on political donations, we will also perform searches and ask questions to assess whether there is a risk to 3i based on your personal and political associations or donations. If there is a risk we will look to assess what additional internal controls we need to put in place to reduce that risk.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to complete the recruitment process or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we collected it (see **Situations in which we will use your personal information** above), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Do we need your consent?

We do not need your consent if we use special categories of your personal information (including in relation to criminal convictions etc) in accordance with our written policy to meet our legal and regulatory obligations and expectations or to perform or exercise obligations or rights in connection with employment or social security law. We may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

3i will need to share your personal information internally with the group (both in the country where you may work and in other countries in which we have operations) and may require to share it with some external parties or associates of 3i.

3i has operations throughout the world. As such, the personal information that we hold may be transferred to, and stored at, a country outside of your country of residence, including countries outside of the EEA, such as the U.S. and India. Where we transfer personal information to 3i group companies or other third parties outside of the EEA, we will ensure that those transfers take place in accordance with applicable data protection laws, including by entering into data transfer agreements with recipients.

To facilitate the recruitment process, your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

3i may also need to share your information with certain external third parties including:

- Companies who provide recruitment and candidate interview and assessment services to 3i;

- Suppliers who undertake background screening on behalf of 3i (credit checking agencies, criminal checking bureaus, etc.);
- Academic institutions (universities, colleges, etc.) in validating information you have provided;
- Individuals and companies that you have previously worked for who may provide references/recommendations to 3i; and
- Other third-party service providers (or potential service providers), who provide services on our behalf.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

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

We may retain and use your personal information to consider you for other positions. If you do not want to be considered for other positions or would like your personal information removed you may contact us (see **Your rights in connection with personal information** below).

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.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the progress of your application.

Your rights in connection with personal information

Data protection legislation gives you a number of rights with regard to your personal information. You have the right to request from us access to and rectification or erasure of your personal information, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability. Any such request should be submitted in writing to the Director, Group Compliance (privacy@3i.com).

If asked to remove a record from our database, we may retain minimal personal information in order to prevent future contact and where required in accordance with legal and regulatory requirements.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the relevant supervisory authority, which in the UK is the Information Commissioners' Office, if you believe that we have not complied with the requirements of the data protection legislation with regard to your personal data.

If you have any questions about this data protection notice, please contact a member of the 3i HR team.