

Rothesay



Privacy Notice

# Who needs to read this privacy notice?

You should read this privacy notice if you are applying for a role with Rothesay Life Plc (or any other company in the Rothesay Group).

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# About us and our relationship with you

Rothesay Life Plc is an insurance company established in the UK with company registration number 06127279 and ICO registration number Z1003678. We are authorised in the UK by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Rothesay Pensions Management Limited (company registration number 06195160 and ICO registration number Z1003616) is a company within the Rothesay group of companies. It employs individuals who carry out the day-to-day operations of Rothesay.

The registered office address for Rothesay and Rothesay Pensions Management Limited is The Post Building, 100 Museum Street, London WC1A 1PB.

Together Rothesay Life Plc and Rothesay Pensions Management Limited make decisions about the hiring of staff and the application process. As a result, we are **joint controllers** under **data protection laws**.

This privacy notice explains how we use and look after your **personal data**. This privacy notice also tells you about your privacy rights and how the law protects you.

## About this document

This privacy notice contains information about:

- The **personal data** that we **process** as a **controller**.
- Where the **personal data** has been obtained.
- The reasons why and lawful bases used to **process** your **personal data**.
- The security measures that we have in place to keep your **personal data** secure.
- The length of time we store your **personal data** for.
- The organisations, or categories of organisation, with whom we might share your **personal data**.
- International transfers of your **personal data**
- The rights you have under **data protection laws** in relation to our **processing** of your **personal data**.

The meaning of words which are shown in **bold underlined** text are explained in the **Glossary**. Throughout this notice any reference to "Rothesay", "we", or "us" refers to Rothesay Life Plc and Rothesay Pensions Management Limited.

**Please note that we may change this privacy notice from time to time.** The latest version of our privacy notice can be found on our website:

> [rothesay.com/data-protection](https://rothesay.com/data-protection)

To request a printed copy of this privacy notice please contact us using the contact details contained in the part of this privacy notice headed **Contact details**.

# Contents

What personal data do we process?	<b>Page 6</b>
Where the personal data has been obtained.	<b>Page 6</b>
The reasons why and lawful bases relied on to process your personal data.	<b>Page 7</b>
How do we keep your personal data secure?	<b>Page 9</b>
How long do we store your personal data?	<b>Page 9</b>
Who has access to your personal data?	<b>Page 9</b>
International transfers	<b>Page 10</b>
Your rights	<b>Page 11</b>
Contact details	<b>Page 12</b>
Glossary	<b>Page 13</b>

## What personal data do we process?

The categories of **personal data** we **process** include the following:

1. **Applicant information: Personal data** relating to each of our job applicants. This includes:
  - Name
  - Email address
  - Telephone number
  - Details of your relevant education and employment history
  - Any **personal data** you have provided within your curriculum vitae, covering letter/emails and other correspondence with Rothesay
  - Any **personal data** you have provided to us during an interview
  - Assessment information (including online tests)
2. **Induction information: Personal data** which we need to process to commence your employment with us following an offer of employment. **Personal data** includes:
  - Bank details
  - Right to work status
  - National Insurance
  - Passport details
3. **CCTV Information: Personal data** relating to individuals processed by the CCTV system operated within our offices.
4. **Sensitive personal data:** This includes:
  - **Personal data** concerning your race or ethnicity, religious beliefs, sexual orientation and political opinions.
  - **Personal data** concerning your health, such as any medical conditions you may have.
  - Information about your criminal record.

## Where the personal data has been obtained.

**Personal data** will usually be collected directly from you through the recruitment exercise.

There will be instances where we collect **personal data** from other sources. These sources include:

1. **Recruitment Agencies:** We fill some of our roles through recruitment agencies. If you apply for a role through a recruitment agency, they will pass us details of your name, contact details, CV, and notes of the interview with the agency.
2. **Your named referees:** We may receive further **personal data** about you from your referees to aid the interview process.
3. **Background check providers:** We employ background check providers as part of the interview screening process. They may provide us with further **personal data** about you.
4. **Social media networks:** We may collect **personal data** about you from social media sites, such as LinkedIn, to the extent relevant and necessary in connection with your employment.

## The reasons why and lawful bases to process your personal data

The table below provides details of the purpose and the lawful bases upon which we **process personal data**.

Type of personal data	Why do we need it?	Lawful bases for processing
<ul style="list-style-type: none"> <li>• <b><u>Applicant Information</u></b></li> </ul>	<p><b>Assessing your suitability for a role</b></p> <p>We <b><u>process personal data</u></b> to contact you about your application for a job with us, assess your relevant experience and suitability for such role and assess what your training needs would be if you started working for us.</p>	<p><b>Legitimate interests pursued by us or by a third party</b></p> <p>We have a legitimate interest to <b><u>process personal data</u></b> during the recruitment process and keep records of the recruitment process. This allows us to manage the recruitment process and assess and confirm your suitability for employment.</p>
<ul style="list-style-type: none"> <li>• <b><u>Sensitive Personal Information</u></b></li> </ul>	<p><b>Assessing your suitability for a role</b></p> <p>We may process <b><u>sensitive personal data</u></b> as part of our assessment of your suitability for a job with us. We may also <b><u>process sensitive personal data</u></b> to make reasonable adjustments to our application process in order to meet your needs.</p>	<p><b>Necessary for complying with our legal obligations as an employer and to comply with employment law</b></p> <p>We need to ensure we comply with our legal obligations under applicable law and regulation.</p> <p>We may also <b><u>process sensitive personal data</u></b> under a substantial public interest condition, such as checking whether there are any unspent criminal convictions which would prevent you from working in the role you have applied for.</p>
<ul style="list-style-type: none"> <li>• <b><u>Applicant Information</u></b></li> <li>• <b><u>Induction Information</u></b></li> </ul>	<p><b>Finalising an offer</b></p> <p>If you are successful at interview and we wish to offer you a role we <b><u>process personal data</u></b> to finalise an offer, such as conducting background checks, right to work checks, and beginning your induction process.</p>	<p><b>Necessary for the performance of a contract.</b></p> <p>When a decision has been made to hire you, we need to <b><u>process</u></b> your <b><u>personal data</u></b> to contract with you.</p>

<ul style="list-style-type: none"> <li>• <b><u>Applicant Information</u></b></li> </ul>	<p><b>Retaining your data</b></p> <p>We store your data for a six-month period following an unsuccessful application.</p>	<p><b>Legitimate interests pursued by us or by a third party</b></p> <p>We have a legitimate interest to retain <b>personal data</b> to respond to and defend against potential legal claims relating to the recruitment process.</p> <p>We also have a legitimate interest to retain your CV and contact details following an unsuccessful application so that we can contact you if an alternative role which we think you might be suitable to apply for becomes available.</p>
<ul style="list-style-type: none"> <li>• <b><u>Applicant Information</u></b></li> </ul>	<p><b>To conduct diversity analysis</b></p> <p>We may <b>process personal data</b> to monitor our performance against our diversity and inclusion initiatives.</p>	<p><b>Legitimate interests pursued by us or by a third party</b></p> <p>We need to take steps to support our diversity and inclusion agenda and to increase accountability and transparency surrounding diversity and inclusion.</p>
<ul style="list-style-type: none"> <li>• <b><u>Applicant Information</u></b></li> <li>• <b><u>CCTV Information</u></b></li> </ul>	<p><b>Managing access to our premises and for security purposes</b></p>	<p><b>Legitimate interests pursued by us or by a third party</b></p> <p>We need to take steps to ensure the personal safety of our staff and visitors as well as protect our buildings and assets from intrusion, theft, vandalism, damage or disruption.</p>

We may also process **personal data** including **sensitive personal data** to comply with other laws, regulations or criminal reporting requirements that we are subject to. This includes compliance with law enforcement agency procedures in connection with various investigations and compliance with any requirement to prevent or detect unlawful acts.



## How do we keep your personal data secure?

Our commitment to corporate security is demonstrated through the implementation of policies, controls and procedures, which are externally certified and audited to the international information security standard, ISO 27001:2013.

Our security policies, controls and procedures are regularly reviewed and updated so that we maintain good practices across our business to keep your information safe.

We have contractual arrangements in place with all of our service providers who **process personal data** in accordance with **data protection laws**. We regularly check that our service providers are complying with their contractual commitments. This includes assessing and reporting on our service providers' information security controls to check their compliance using questionnaires and/or on-site audits.

## How long do we store your personal data?

We will only keep your **personal data** for so long as we reasonably required and, in any event, only for as long as our internal rules and policies allow us to fulfil our business or legal and regulatory obligations. This will usually be six months after an unsuccessful application.

If your application for a job with us is successful and you start work as our employee, please see the Staff Privacy Notice for details of how long we will retain the data gathered during the recruitment exercise. If you apply for a new role with us when you are already our employee, this privacy notice applies in respect of any new information gathered during that application process, and the Staff Privacy Notice continues to apply in respect of any information we already hold by virtue of you being a current employee.

## Who has access to your personal data?

We share **personal data** with a variety of other companies to operate our business. However, we only share the **personal data** where necessary to help us satisfy one or more of the reasons for processing set out above.

We have detailed the types of companies with whom we currently share **personal data** below. The companies fall into two categories:

- **Processors with whom we share personal data**

For these companies, we determine the purposes for which the **personal data** we pass to them is **processed** and they should not **process** that **personal data** other than in accordance with our written instructions. Processors with whom we share personal data:

- 1. IT service providers**

Our main IT infrastructure and core software is provided by Goldman Sachs Group, Inc. This means that **personal data** we **process** is stored on Goldman Sachs' IT systems.

- 2. Other service providers to our business**

Other companies who **process personal data** on our behalf include those who provide day-to-day operational business services such as emails, archiving, document scanning and copying, document destruction and printing.

- **Controllers with whom we share personal data**

For these companies, we do not determine the purposes for which the **personal data** we pass to

them is **processed** once it is shared. To understand how the other **controllers process** your **personal data**, you should refer to their privacy notices. Controllers with whom we share personal data:

**1. Background check provider:**

As a regulated firm, we have to share **personal data** with our background check providers so that they can conduct appropriate checks prior to offering you a contract with Rothesay.

**2. Professional advisers**

We sometimes have to share **personal data** with our professional advisers (including accountants and lawyers) where it is required for the purposes of their advice.

**3. Regulators, law enforcement and auditors**

We will share **personal data** when requested by regulators, law enforcement agencies or other third parties to comply obligations imposed on us by laws and regulations.

## International transfers of your personal data

Where personal data is transferred to and **processed** in a country outside of the UK or the EEA (as applicable), we take steps to provide appropriate safeguards to protect your **personal data**, including by entering into approved standard contractual clauses obliging recipients to protect your **personal data** and only transferring **personal data** to the extent that an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of **personal data** is ensured in compliance with **data protection laws**.

If you want further information on the specific mechanisms used by us when transferring your **personal data** outside of the UK or EEA, please contact us using the details contained in the part of this privacy notice headed **Contact details**.

## Your rights

Under certain circumstances, you have the following rights under **data protection law**:

- The right of access to **personal data** relating to you (known as Subject Access Requests).
- The right to correct any mistakes in your **personal data**.
- The right to require us to delete your **personal data**.
- The right to restrict our **processing** of your **personal data**.
- The right to object to us **processing** your **personal data, including for marketing purposes**.
- The right to have your **personal data** provided to another **controller**.

### **How to exercise your rights**

If you wish to exercise any of your rights, please contact us using the details contained in the part of this privacy notice headed **Contact details**.

## Contact details

### How to contact us regarding this privacy notice

You may want to contact us to:

- Ask any questions you have in relation to the information contained in this privacy notice.
- Exercise any of your rights under **data protection laws**.
- Request a printed copy of this privacy notice.
- Request a version of this privacy notice printed in large print or braille.
- Request an audio version of this privacy notice.
- Make a complaint (see below).

To contact us you can email our DPO at **[dpo@rothesay.com](mailto:dpo@rothesay.com)** or write to:

> Data Protection Team, Rothesay Life Plc, The Post Building, 100 Museum Street, London WC1A 1PB

If you live within the European Union, you can also contact our European representative. Their details are as follows:

> Bird & Bird GDPR Representative Services SRL, Avenue Louise 235, 1050 Bruxelles, Belgium Or email

**[EUrepresentative.Rothesay@twobirds.com](mailto:EUrepresentative.Rothesay@twobirds.com)**

### How to make a complaint

If you have a problem or concern relating to the ways we **process** your **personal data** or the contents of this privacy notice, please contact us in the first instance.

We hope that we will be able to address the problem or concern to your satisfaction. However, you also have the right to make a complaint to the Information Commissioner's Office. The process for making a complaint to the Information Commissioner's Office is available here: <https://ico.org.uk/make-a-complaint/>. Their contact details are as follows:

> Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Or phone 0303 123 1113

> **[ico.org.uk](https://ico.org.uk)**

# Glossary

The terms shown in **bold underlined** text in this privacy notice have the meanings shown below.

**Applicant information: Personal data** relating to each of our job applicants. This includes:

- Name
- Email address
- Telephone number
- Details of your relevant education and employment history
- Any **personal data** you have provided within your curriculum vitae, covering letter/emails and other correspondence with Rothesay
- Any **personal data** you have provided to us during an interview
- Assessment information (including online tests)

**CCTV Information: Personal data** relating to individuals processed by the CCTV system operated within our offices.

**controller**: the entity which determines the purposes for which, and the manner in which, any **personal data** is **processed**.

**data protection laws**: any law relating to the use of Personal Data, as applicable to the Parties, including:

a) in the United Kingdom:

- i) the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union ("UK GDPR") and the Data Protection Act 2018, and/or any corresponding or equivalent national laws and regulation in the United Kingdom and/or any other applicable jurisdiction; and/or
- ii) the Privacy and Electronic Communications (EC Directive) Regulations 2003, and any laws or regulations implementing Directive 2002/58/EC (e-Privacy Directive) and/or any corresponding or equivalent national laws and regulation;

b) in member states of the European Union (EU) and/or the EEA: the GDPR and the e-Privacy Directive, and all relevant EU and EEA member state laws or regulations giving effect to or corresponding with any of them; and

c) any judicial or administrative interpretation of any of the above.

**induction information: Personal data** which we need to **process** to commence your employment with us following an offer of employment. **Personal data** includes:

- Bank details
- Right to work status
- National Insurance
- Passport details

**joint controllers**: a **controller** who together with one or more other **controllers** jointly determine the purposes and means of **processing** the same **personal data**.

**personal data**: any information relating to a living identifiable individual, including:

- Information such as names, addresses, telephone numbers, email addresses, photographs, voice recordings and financial information
- Expressions of opinion and indications of intentions about individuals (and their own

expressions of opinion/intentions)

- Information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future

**processor:** any entity which **processes personal data** on behalf of a **controller**.

**Processing, processed** or **process:** this covers almost anything a company or individual can do with **personal data**, including:

- Obtaining, recording, retrieving, consulting or holding it
- Organising, adapting or updating it
- Disclosing, sharing or otherwise making it available
- Cleansing, blocking, erasing or destroying it

**Sensitive personal data:** any information relating to any of the following:

- Racial or ethnic origin
- Political opinions
- Religious beliefs or beliefs of a similar nature
- Trade union membership
- Physical or mental health
- Sexual life or orientation
- Genetic data or biometric data for the purpose of uniquely identifying an individual
- Personal data relating to criminal convictions and offences

# Rothestay

'Rothestay' is the trading name for Rothestay Life Plc. Registered in England No. 6127279. Registered office: The Post Building, 100 Museum Street, London WC1A 1PB.

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