

# Triodos Bank.

## UK Recruitment Privacy Statement

The Triodos Bank UK (TBUK) recruitment *Privacy Statement* provides transparency on how your *personal data* will be collected and used during the recruitment and selection process, sets out your rights and the measures TBUK will take to protect your personal data. This includes how we will use your information, what rights you have, and how the law protects you. TBUK is a *Data Controller* as defined under data privacy legislation.

We may update this notice from time to time.

The [appendix](#) at the end of this document provides an overview of the personal data that we collect, the purposes for which we use that data, the legal basis which permits us to use it and the rights that you have in relation to your personal data.

Any terms with a specific definition used in this statement, are highlighted in *italics* and are explained in the Glossary section.

### Contact details

Our contact details are Deanery Road, Bristol, BS1 5AS. Telephone: 0330 355 0355

### Human Resources Team

For more information or queries related to the processing of personal data of co-workers, please contact the HR team at [hr@triodos.co.uk](mailto:hr@triodos.co.uk)

### Data Privacy Officer (DPO)

TBUK have appointed a *Data Privacy Officer* (DPO) who has responsibility for advising us on our data protection obligations. You can contact the DPO using our website [www.triodos.co.uk](http://www.triodos.co.uk)

### What is personal data?

Personal data is any information that tells us something about you. This could include information such as your name, contact details, date of birth, and bank account details.

### What does processing mean?

The processing of personal data means any interaction with the information including viewing, collecting, sharing, storing, transferring or analysing it for instance. This can be by both a Data Controller, or a *Data Processor*.

### Who holds your personal data?

Your personal data will be held by Triodos Bank N.V in The Netherlands and by TBUK. The use of your personal data is covered by Triodos Bank's registration with the UK *Information Commissioner's Office*; registration number Z6794013.

### How do we collect personal data?

We collect personal data about you from various sources including:

- from you when you contact us directly through the application and recruitment process; and
- from other people when we check references or carry out background checks – if we do this we will inform you during the recruitment process of the exact checks that are carried out.

### What personal data do we collect?

We collect the following categories of personal data about you:

Category of personal data	Description
Contact information	How to contact you including where you live, your telephone number and your email address (where relevant).
Personal details	Personal information such as your gender, date of birth, next of kin and emergency contact information.
Equal opportunities monitoring information	Personal information such as your gender.

Identification information	A number or code given to you by a government authority to identify who you are, such as your UK National Insurance number, copies of identification documents such as your passport or driving licence.
Recruitment information	Copies of right to work documentation, qualifications, references and other information in your CV or cover letter or otherwise provided as part of the application process).
Criminal information	Information about criminal convictions and offences committed by you.

### How do we use your personal data?

We use your personal data for the following purposes:

- To make decisions about your recruitment and appointment;
- To check you are legally entitled to work in the UK;
- To assess your qualifications for a particular job or task;
- To conduct data analytics studies to review and better understand job application rates; and
- To carry out equal opportunities monitoring.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

### What is the legal basis that permits us to use your personal data?

Under data privacy legislation we are only permitted to use your personal data if we have a legal basis (known as a *lawful basis for processing*) for doing so as set out in legislation. We rely on the following legal bases to use your personal data for employment/engagement related purposes:

- Where we need your personal data to enter into a contract with you;
- Where we need to comply with a legal obligation; and
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

The table at the end of this notice provides more detail about the personal data that we use, the legal basis that we rely on in each case and your rights.

### *Special Categories of Personal Data*

Some personal data is classified as more sensitive under data privacy legislation. This includes information relating to health, racial or ethnic origin, religious or philosophical beliefs, political opinions, genetic and biometric data, sex life, sexual orientation and trade union membership. As this data is more sensitive, we need to have further justification for collecting, storing and using this type of personal data. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.

We may process special categories of personal data and criminal conviction information in the following circumstances:

- In limited circumstances with your explicit consent, in which case we will explain the purpose for which the personal data will be used at the point where we ask for your consent;
- We will use information about your physical and mental health or disability status to comply with our legal obligations, including to ensure your health and safety in the workplace; and
- We will use information about your health, race or ethnic origin, religious or philosophical beliefs to ensure meaningful equal opportunity monitoring and reporting – the legal basis of this processing is that it is in the public interests to carry out diversity monitoring.

### What happens if you do not provide the personal data that we request?

We need some of your personal data in order to conduct the recruitment and selection process. If you do not provide such personal data, we may not be able to continue with the recruitment process or offer you employment/engagement. We explain when this is the case at the point where we collect personal data from you.

### How do we share your personal data?

We share your personal data in the following ways:

- Where we use *third party* providers who process personal data on our behalf in order to provide services to us. This includes recruitment agents and IT system providers;
- We will share your personal data with third parties where we are required to do so by law or to comply with our regulatory obligations;
- With other entities in our group as part of our regular reporting activities and in the context of a business reorganisation or group restructuring exercise; and
- If we sell any part of our business and/or integrate it with another organisation your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers.

Where we share your personal data with third parties we ensure that we have appropriate measures in place to safeguard your personal data and to ensure that it is solely used for legitimate purposes in line with this Privacy Statement.

#### **How do we keep your personal data secure?**

We will ensure access to personal data is restricted to data processors within our group, for the purposes of processing personal data within the legal bases outlined above. Training will be provided to any data processors within the group to ensure that personal data is processed securely and within the legal bases only.

#### **When do we transfer your personal data overseas?**

Triodos' default position is that we will not disclose or transfer personal data to organisations outside of the *European Economic Area* (EEA). However, where this is required we will inform you and confirm why we need to do this. When we do transfer personal data outside of the EEA, we will make sure that it is protected at the same level as within the EEA by using one of these safeguards:

- Transfer data to organisations in non-EEA countries (or states or provinces of these countries) with privacy laws in place providing the same level of data privacy protection as within the EEA;
- Transfer data to organisations that are part of *Privacy Shield* which is an international framework that sets privacy standards at a similar level as those of the EEA; or
- Put a contract in place with the recipient ensuring that they will process the data with the same level of data protection as within the EEA.

We do not send your personal data outside of the EEA. If this changes you will be notified of this.

#### **How long do we keep your personal data for?**

As a general rule we keep personal data about candidates for the duration of the recruitment and selection process and for a period of six months after candidates have been notified whether their application has been successful. However, where we have statutory obligations to keep personal data for a longer period such as immigration checks for example, or where we may need your personal data for a longer period in case of a legal claim then the retention period may be longer.

Full details of the retention periods that apply to your personal data are set out in our Data Retention and Deletion policy which is available on request.

#### **Your rights in relation to your personal data**

You have a number of rights in relation to your personal data, these include the right to:

- be informed about how we use your personal data;
- obtain access to your personal data;
- request that your personal data is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal data in the following circumstances:
  - if we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
  - if we are relying on consent as the legal basis for processing and you withdraw consent;
  - if we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
  - if the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation);
  - if it is necessary to delete the personal data to comply with a legal obligation.

- ask us to restrict our data processing activities where you consider that:
  - personal data is inaccurate;
  - our processing of your personal data is unlawful;
  - where we no longer need the personal data but you require us to keep it to enable you to establish, exercise or defend a legal claim;
  - where you have raised an objection to our use of your personal data;
- request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to take steps to enter into a contract with you and personal data where we are relying on consent to process your personal data.  
TBUK does not currently have the functionality to fulfil this type of request.
- object to our processing of your personal data where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data; and
- not be subject to automated decisions which produce legal effects, or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please use our website.

The [appendix](#) at the end of this notice provides more detail about the personal data that we use, the legal basis that we rely on in each case and your rights.

### **How to Complain**

Please contact us in the first instance if you have any concerns with how we have processed your personal data. Details on how to do this are included in our website. You also have the right to lodge a complaint directly with the ICO; please visit their website (<https://ico.org.uk/for-the-public/>) for further details on how to do this.

If you choose, you can also lodge a complaint with the Dutch Data Protection Supervisory Authority (Autoriteit Persoonsgegevens); they are the *lead supervisor* for data privacy for Triodos. Please [visit their website](https://autoriteitpersoonsgegevens.nl/en) (<https://autoriteitpersoonsgegevens.nl/en>) for further details.



## Appendix One: How we use your personal data

Purpose	Personal data used	Legal basis	Which rights apply? *
Recruitment decisions	Personal contact information, recruitment information including qualifications, references and other information in your CV or cover letter or otherwise provided as part of the application process, employment/ engagement records, compensation history, identification documents such as your passport or driving licence.	Legitimate interests - it is in our legitimate interests to evaluate whether you have the necessary skills and qualities to perform the relevant role.	The generally applicable rights plus the right to object.
Right to work checks	Information relating to your right to work status, national insurance number, passport number, nationality, tax status information, and personal contact details.	Legitimate interests - it is in our interests to ensure that those who work for us have the right to work in the UK as well as to establish the statutory excuse to avoid liability for the civil penalty for employing someone without the right to undertake the work for which they are employed.	The generally applicable rights plus the right to object.
Fraud and crime prevention	Information about criminal convictions and offences committed by you. Identity verification information.	Public interest and legitimate interests - it is in our interests as well as the interest of our candidates/ employees/ workers/ contractors to ensure the prevention of fraud and crime is monitored. This will ensure a safe workplace for all.	The generally applicable rights plus the right to object.
Diversity monitoring	Gender.	Public interest.	The generally applicable rights plus the right to object.
To deal with legal disputes	Personal contact details, recruitment information including qualifications, references and other information in your CV or cover letter or otherwise provided as part of the application process, information submitted as part of the selection process and interview notes.	Legitimate interests - it is in our interests to process personal data to make and defend legal claims to ensure that our legal rights are protected.	The generally applicable rights plus the right to object.

\*The following generally applicable rights always apply: right to be informed, right of access, right to rectification, right to erasure, right to restriction and rights in relation to automated decision making.

## Glossary

Term	Definition
Data Controller	An individual or organisation which determines why personal data needs to be processed, and the manner it is processed in.
Data Privacy Officer	A position within an organisation responsible for ensuring that personal data is processed in accordance with UK data privacy requirements.
Data Processor	An individual or organisation which processes personal data on behalf of a data controller, in accordance with instructions from the data controller.
European Economic Area (EEA)	The European area which provides for the free movement of persons, goods, services and capital; it is made up of EU members plus other countries within Europe which have agreements in place with the EU.
Financial Conduct Authority	A UK regulatory body operating independently of the UK Government, which oversees the regulation of conduct by financial services firms operating in the UK.
Information Commissioner's Office (ICO)	The independent UK authority set up to uphold data privacy rights in the public interest.
Lawful basis for processing	One of six allowable lawful bases for processing must be satisfied for Triodos to process your personal data. The six lawful bases are: <ol style="list-style-type: none"> <li>1. Consent - the individual has given clear consent</li> <li>2. Contract - processing is necessary for a contract to be provided</li> <li>3. Legal obligation - processing is necessary to comply with the law</li> <li>4. Protect life - processing is necessary to protect someone's life</li> <li>5. Public interest - processing is necessary to perform a task in the public interest</li> <li>6. Legitimate interest - processing is necessary for Triodos' legitimate interests, or the legitimate interests of a third party, unless there is a good reason to protect the individual's data which overrides these legitimate interests.</li> </ol>
Lead Supervisor	Triodos operates across Europe in the UK, France, Belgium, Germany, Spain and The Netherlands. The Group headquarters are in The Netherlands, which means that the main data privacy supervisory body is the Dutch Data Protection Supervisory Authority. TBUK also follows UK data privacy requirements set by the UK government and the ICO.
Legitimate interests	The business reason for Triodos to use your information. It must not conflict unfairly with your rights and interests. GDPR specifically mentions several examples of legitimate interests such as the prevention of fraud, marketing customers could reasonably expect to receive, or IT security for instance.
Personal Data	Any information relating to an identified or identifiable natural person (an individual).
Privacy Shield	A framework for transatlantic exchanges of personal data between the European Union (EU) and the United States of America (USA). It was designed to provide organisations on both sides with a mechanism compliant with data privacy

	requirements when transferring personal data from the EU to the USA.
Privacy Statement	A document providing data subjects with the information organisations are required to provide under GDPR.
Special Categories of Personal Data	<p>Personal data which relates to characteristics including racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health or medical information, sexual life or orientation.</p> <p>Additional protection is required for personal data falling into this category, and both a general <u>and</u> specific lawful basis for processing are required. This means that one of the six general GDPR lawful bases for processing is needed, as well as one of the following which relate specifically to special categories of personal data:</p> <ol style="list-style-type: none"> <li>1. explicit consent</li> <li>2. processing is necessary for meeting obligations under employment, social security and social protection law</li> <li>3. processing is necessary to protect the vital interests of someone who is unable to provide consent</li> <li>4. processing is carried out during legitimate activity by a Foundation, Association or other not-for-profit body with a political, philosophical, religious, or trade union-based aim and processing relates to current or former members of that organisation, and that personal data is not disclosed outside of that organisation</li> <li>5. processing relates to personal data which has been disclosed by the individual</li> <li>6. processing is necessary in connection with legal claims</li> <li>7. processing is necessary for substantial public interest</li> <li>8. processing is necessary for preventative or occupational health</li> <li>9. processing is necessary for public interest in the area of public health</li> <li>10. processing is necessary for archiving purposes in the public interest such as scientific, historic or statistical research</li> </ol>
Third parties	Organisations external to Triodos who undertake services and activity on our request such as our business partners, suppliers and affiliates.



Freephone: 0330 355 0355  
contact@triodos.co.uk  
www.triodos.co.uk

Calls to and from Triodos Bank may be recorded for training and monitoring purposes. Triodos Bank NV (incorporated under the laws of the Netherlands with limited liability, registered in England and Wales BR3012). Authorised by the Dutch Central Bank and subject to limited regulation by the Financial Conduct Authority and Prudential Regulation Authority. Details about the extent of our regulation by the Financial Conduct Authority and Prudential Regulation Authority are available from us on request. Registered Office: Triodos Bank, Deanery Road, Bristol BS1 5AS. VAT reg no 793493383

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