
Data controller: Momentum Global Investment Management Limited (“The Company”)

As part of any recruitment process, The Company collects and processes personal data relating to job applicants.

The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does The Company collect?

The Company collects a range of information about you. This includes:

- » your name, address and contact details, including email address and telephone number;
- » details of your qualifications, skills, experience and employment history;
- » information about your current level of remuneration, including benefit entitlements;
- » whether or not you have a disability for which The Company needs to make reasonable adjustments during the recruitment process;
- » information about your entitlement to work in the UK; and
- » equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The Company collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

The Company will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does The Company process personal data?

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows The Company to manage the recruitment process, assess and confirm a candidate’s suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

Where The Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

In some cases, The Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant’s eligibility to work in the UK before employment starts.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where The Company processes other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time.

For some roles, The Company is obliged to seek information about criminal convictions and offences. Where The Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The Company will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes [members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles].

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with [former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks].

How does The Company protect data?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Because of the international nature of our business, we may need to transfer your Personal Data outside the EU to companies within the MMI Holdings Limited group of companies and to third parties. In these cases, we will ensure that such transfers take place in accordance with applicable data protection laws and regulations. You can obtain further information regarding the mechanisms used to safeguard your data by contacting our HR Department.

For how long does The Company keep data?

If your application for employment is unsuccessful, The Company will hold your data on file for 6 months after the end of the relevant recruitment process.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- » access and obtain a copy of your data on request (you can make a subject access request by completing the Company's form for making a subject access request. The form can be obtained by contacting Candice Egan - candice.egan@momentum.co.uk);
- » require the Company to change incorrect or incomplete data;
- » require the Company to delete or stop processing your data, for example where:
 - » We no longer need to use the personal data to achieve the purpose we collected it for
 - » You withdraw your consent if we're using your personal data based on that consent
 - » Where you object to the way we use your data, and there is no overriding legitimate interest

- » require the Company to restrict our processing of the personal data we hold about you. This right will only apply where for example:
 - » You dispute the accuracy of the personal data we hold
 - » You would like your data erased, but we require to hold it in order to stop its processing
 - » You have the right to require us to erase the personal data but would prefer that our processing is restricted instead
 - » Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
- » request to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to make us transfer this personal data to another organisation.
- » withdraw your consent, where we're relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

If you wish to exercise any of these rights you should set out your request in writing to the Company's HR department. If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner (0303 123 1113 or casework@ico.org.uk).

You will not be subject to employment decisions based solely on automated data processing without your prior consent.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to The Company during the recruitment process. However, if you do not provide the information, The Company may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Automated decision-making

Recruitment processes are not based solely on automated decision-making.
