



Privacy Notice for Candidate

1. **The controller** of your personal data is *PRA Group (UK) Limited*, located at *Level 11 Riverside House, 2A Southwark Bridge Road, London, SE1 9HA* (hereinafter “we” “our” and “us”).
2. **Contact point** for matters concerning data protection:
 - a) e-mail: hr-dataprotection@pragroup.eu
 - b) post: Human Resource Department, PRA Group (UK) Limited, PO Box 26249, Kilmarnock, KA3 1HA
3. **Purpose of processing personal data and legal basis:**

Application: activities carried out in the course of collecting and reviewing information on application forms or CVs. This may involve the processing of your CV, name, address, employment history, academic and professional qualifications, age, nationality and previous disciplinary matters;

Article 6(1)(a) of the UK GDPR we process your application on the basis of a consent provided to us when applying for a position;

Assessment: activities carried out in the course of the recruitment process to ensure your suitability for roles with us, which may involve the processing of your CV, assessment centre interviews (such as a role play, group exercise or presentation), interview (face to face, telephone or video), technical assessments or other appropriate tests for the role, shortlisting the candidates;

Article 6(1)(f) of the UK GDPR on the basis of our legitimate interest as your potential employer;

Special categories: we do not require you to disclose any special categories of personal data. However, during the course of your application you can decide to share with us information about yourself that are considered as special categories of personal data. Such information can be health conditions which require us to consider making reasonable adjustments for you to undertake the recruitment process.

Article 9(2)(b) of the UK GDPR on the basis of necessity to carry out our obligations to ensure the candidate reasonable adjustments at any stage of the recruitment process;

Defend our interest: after the end of the recruitment process, we will process your data in order to defend against claims that result from the recruitment process.

Article 6(1)(f) of the UK GDPR on the basis of our legitimate interest as your potential employer;

Management of IT systems and tools, its development and enhancement, including AI- based solutions and the training algorithms.

Article 6 (1)(f) of the UK GDPR on the basis of our legitimate interest in improving business processes and operational efficiency.

Future recruitment: if you agree to the storage of your data after the recruitment process in which you participated, we may retain your application for future recruitments that we may carry out.

Article 6(1)(a) of the UK GDPR on the basis of your consent.

If you are the **successful candidate** (where we have made an offer of employment to you, in order to conclude an employment contract) additionally we will process your data for the purposes set out below.

Pre-contractual process: we will process your personal data prior to entering an employment contract in order to prepare your contract and the measures necessary for you to start performing your employment duties

Article 6(1)(b) and (f) of the UK GDPR on the basis of pre-contractual processing, legal obligation and our legitimate interest, as your future employer

Pre-employment screening (PES): pre-employment screening activities carried out in-house or by a third party provider for the purposes of identity verification, education qualifications checks, employment checks, financial, credit history, criminal records checks; county court judgements checks, adverse media checks, active directorship checks, information regarding your eligibility to work, national identification information (e.g. passport details). In some cases, we will seek information from third parties, such as references or details of your disciplinary record from former employers and whilst undertaking checks such as criminal records, credit and background screening checks including UK Home Office legal right to work verification or publicly available sanction lists including lists maintained by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC).

Article 6 (1)(b) of the UK GDPR we process information of a successful candidate in order to enter into a contract of employment and 6(1)(f) of the UK GDPR on the basis of our legitimate interest as your potential employer and to comply with rules and guidelines issued by regulatory authorities;

Equality of opportunity or treatment: we process special categories of personal data (ethnic origin(s), disability and sexual orientation) to promote and maintain equality of opportunity.

Art. 9 (2)(g) of the UK GDPR with accordance with Part 2 of Schedule 1 of Data Protection Act 2018 and Equality Act 2010.

4. **Source of data**

If you did not send us your application directly, we have obtained your data from your CV, job application and from other data you may have provided to the recruitment agency or the person that has recommended you in our referral program.
5. **Data recipients and data transfer**

- a) For the abovementioned purpose(s) we can share your data with the following recipients: (i) to any of our related affiliates within the PRA Group of companies; (ii) recruitment and other third party agencies; (iii) vendors that provide us with services, such as IT service providers or HR system provider; (iv) fraud prevention agencies and law enforcement agencies where you give us false or inaccurate information or where we suspect identity fraud (v) where we have your consent, or as required, or as permitted by law, including to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or we have a legitimate interest in making a disclosure, such as where necessary to protect our rights and property;
- b) Your personal data may be transferred to a recipient in a third country for example, in connection with the use of a foreign IT subcontractor or in connection with the provision of intra-group services. Additionally, if your data appears on the OFAC sanction lists, we will share this information with PRA Group, Inc., which will mean the transfer of your data to the USA;
- c) We may transfer your personal data on the basis of an adequacy regulations of the Secretary of State stating the appropriate level of protection or standard data protection clauses. You have the right to obtain from us confirmation of the conclusion of appropriate contractual arrangements.

6. Data Storage

Your personal data is stored for the duration of the recruitment activity and after its completion:

- a) for unsuccessful candidates, CVs, application forms, interview notes and feedback will be kept on file for no longer than 12 months;
- b) for unsuccessful candidates who have given us additional consent to process their data for the future recruitments data will be kept for no longer than 12 months;
- c) if the candidate is successful, the documents will be transferred to the employee staff file and the applicable legal timeframes will apply.

7. Your Rights

We also would like to inform you that, subject to further legal obligations, you have the following **rights**:

- a) Right to access to your personal data - Article 15 of the UK GDPR;
- b) Right to rectify your personal data - Article 16 of the UK GDPR;
- c) Right to erasure (right to be forgotten) - Article 17 of the UK GDPR
- d) Right to restriction of processing - Article 18 of the UK GDPR
- e) Right to data portability - Article 20 of the UK GDPR
- f) Right to object to processing - Article 21 of the UK GDPR
- g) Right to not to be subject to a decision based solely on automated processing including profiling – Article 22 of the UK GDPR
- h) Right to lodge a complaint to controller – section 164A of Data Protection Act 2018, as amended by Data (Use and Access) Act 2025
- i) Right to make a complaint to a competent supervisory authority, if you believe that the processing of your personal data is unlawful. The name of the competent supervisory authority is the following: the Information Commission.

8. Right to withdraw a consent

Where the processing of your personal data is based on consent given to us for one or more specific purposes, you may withdraw your consent at any time. We would like to inform you that withdrawal of the consent does not affect the lawfulness of the processing before its withdrawal. If you wish to withdraw your consent, please contact us. You can find our contact details in point 2.

9. Automated decision-making

We are not making an automated decision based on your personal data.

10. Requirement to provide data

Providing data in the recruitment process is voluntary, but it is necessary to participate in the recruitment process. Failure to provide required personal data may mean that we will not be able to consider your application. Providing data for the purpose of concluding a contract with the selected candidate is a necessary condition for conclusion of an employment contract. Failure to provide data will prevent the conclusion of the contract.

11. EU Representative

We have appointed PRA Group Polska Holding sp. z o.o., a company incorporated in Poland under the company registration number 0000537397 with its registered office at Prosta 68, 00-838 Warsaw, Poland, to act as our representative in the EU/EEA. Contact details for our European Representative are as follows: Email: eu_uk-dprepresentative@pragroup.eu.

12. Contact details of the data protection officer

- a) E-mail: privacy@pragroup.co.uk
- b) post: PO Box 26249, Kilmarnock, KA3 1HA, with the note "Data Protection Officer"