

IRIS GROUP CANDIDATE PRIVACY NOTICE

Entities covered

- Iris Insurance Brokers Ltd ("Iris")
- Blink Intermediary Solutions Ltd ("Blink")
- Vivid Underwriting Ltd ("Vivid")

Policy Owner: Group Compliance

Approval: Board of Iris Insurance Brokers Ltd and, where appropriate, the governing bodies of Blink and Vivid

Version: 2.0

Status and interpretation: This document consolidates and updates the policy framework from supplied Iris and Vivid materials. It does not certify that historic practices, every contractual arrangement or all parent-group requirements have been verified. Where legal, regulatory, Lloyd's, capacity-provider, principal or ANV/AmTrust requirements impose stricter controls, those requirements prevail; Compliance must record the applicable variation.

1. Introduction

Iris Insurance Brokers Limited ("Iris", "we", "us" or "our") is committed to protecting the privacy and personal information of individuals who apply for employment with us. This Candidate Privacy Notice explains how we collect, use, store and protect personal data during our recruitment and selection processes, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

This Notice applies to individuals who apply for employment with Iris, whether directly, through recruitment agencies or via other recruitment channels. It also applies to individuals who submit speculative applications or express an interest in future employment opportunities.

Iris Insurance Brokers Limited is the data controller responsible for personal information processed in connection with recruitment undertaken by Iris.

2. Personal data we collect

During recruitment, we may collect and process the following categories of personal information, where relevant to the position applied for:



- **Personal details:** Name, address, email address, telephone number and other contact information.
- **Employment information:** Employment history, previous employers, job titles, professional experience, references and salary expectations.
- **Qualifications and skills:** Education, professional qualifications, training, certifications and relevant professional memberships.
- **Application information:** CVs, covering letters, application forms, interview notes, assessment results and recruitment correspondence.
- **Identity and eligibility information:** Date of birth, nationality, identity documentation, right-to-work information and relevant immigration status.
- **Pre-employment screening:** Employment references, qualification verification, regulatory checks and other background screening appropriate to the position.
- **Regulatory information:** Information required to assess fitness, propriety and suitability for positions subject to Financial Conduct Authority (FCA) requirements.
- **Special category information:** Health or disability information where necessary to make reasonable adjustments or comply with employment law obligations.

Where legally permitted and justified by the position, we may also process information concerning criminal convictions, financial background or other relevant screening results. We will only collect information reasonably necessary and proportionate to the recruitment process and the requirements of the position.

3. How we collect personal data

We may obtain candidate information from:

- You directly, through applications, CVs, interviews and correspondence.
- Recruitment agencies, employment consultants and professional networking platforms.
- Previous employers, referees and educational or professional institutions.
- Background screening and verification providers.
- Publicly available professional information, where relevant and appropriate.
- Regulatory bodies or professional registers, where checks are necessary for the position.

Where information is obtained from third parties, we will ensure that its collection and use are lawful, relevant and proportionate.



4. Why we process personal data

We process candidate information for legitimate recruitment and employment-related purposes, including:

- Reviewing applications and assessing suitability for employment.
- Communicating with candidates and arranging interviews.
- Evaluating qualifications, experience and professional competence.
- Conducting appropriate employment references and background checks.
- Verifying identity and eligibility to work in the United Kingdom.
- Meeting applicable legal and regulatory obligations, including FCA requirements where relevant.
- Making recruitment decisions and issuing offers of employment.
- Maintaining appropriate recruitment records and responding to recruitment-related enquiries or disputes.
- Considering candidates for future vacancies, where appropriate and in accordance with this Notice.

Where an applicant is successful, relevant recruitment information may be transferred to their employment record and processed in accordance with Iris's employee privacy and data protection arrangements.

5. Lawful bases for processing

Under the UK GDPR, Iris must have a lawful basis for processing personal data. Depending on the purpose, we rely on the following lawful bases:

Steps prior to entering into a contract – Article 6(1)(b)

Processing necessary to consider an application, assess suitability and take steps at a candidate's request before entering into an employment contract.

Legal obligation – Article 6(1)(c)

Processing necessary to comply with applicable legal and regulatory requirements, including right-to-work obligations and relevant FCA requirements.

Legitimate interests – Article 6(1)(f)

Processing necessary for our legitimate interests in managing recruitment, assessing candidates, maintaining appropriate records, safeguarding our business and establishing, exercising or defending legal claims, provided those interests are not overridden by the rights and freedoms of the individual.

Consent – Article 6(1)(a)



Where we rely on consent for a specific activity, we will request it separately and explain how it may be withdrawn. Consent is not generally relied upon for routine recruitment processing.

6. Special category and criminal offence data

In limited circumstances, we may need to process special category personal data, including health or disability information.

For example, this may be necessary to:

- Make reasonable adjustments during the recruitment process.
- Comply with employment law obligations.
- Assess fitness for work where lawful and appropriate.

Where special category information is processed, we will identify an appropriate condition under Article 9 of the UK GDPR and, where required, Schedule 1 of the Data Protection Act 2018.

This may include processing necessary to meet obligations or exercise rights under employment law.

Criminal offence information will only be processed where permitted by law, supported by an appropriate Article 6 lawful basis and an applicable condition under the Data Protection Act 2018.

We will apply appropriate safeguards and restrict access to sensitive information to authorised personnel with a legitimate need to know.

7. Pre-employment and regulatory checks

As an FCA-authorised insurance intermediary, Iris may be required to undertake additional checks for certain positions, particularly where individuals will perform regulated functions or be subject to fitness and propriety requirements.

Depending on the role, these checks may include:

- Verification of identity and right to work.
- Confirmation of qualifications and employment history.
- Employment and regulatory references.
- Relevant professional or regulatory registration checks.
- Criminal record, financial background or other suitability checks, where legally permitted and justified.



We will only undertake checks appropriate to the position and will inform candidates where additional screening is required.

8. Sharing personal data

Candidate information may be shared, where necessary, with:

- Authorised Iris personnel involved in recruitment and management.
- Relevant group companies and authorised group HR personnel where they provide recruitment or administrative services.
- Recruitment agencies and external recruitment consultants.
- Background screening, reference and verification providers.
- IT, HR and recruitment system providers acting on our behalf.
- Professional advisers, regulators or public authorities where disclosure is legally required or otherwise lawful.

Personal information will only be shared where there is a legitimate business or legal requirement, and appropriate confidentiality, security and data protection arrangements will apply.

We do not sell candidate personal data or disclose it to third parties for unrelated marketing purposes.

9. International data transfers

Where recruitment information is processed or accessed outside the United Kingdom, including through group companies or third-party service providers, Iris will ensure that any restricted international transfer complies with applicable UK data protection legislation.

Where required, appropriate safeguards will be used, which may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses or other legally recognised transfer mechanisms.

Further information about relevant international transfers and safeguards may be requested using the contact details below.

10. Retention of candidate information

We retain personal information only for as long as reasonably necessary for the purpose for which it was collected, including applicable legal, regulatory and recordkeeping requirements.

Our standard retention arrangements are:



- **Unsuccessful applicants:** Recruitment records will normally be retained for six months following the conclusion of the recruitment process, after which they will be securely deleted, unless a longer period is necessary for a specific lawful purpose.
- **Future opportunities:** Where we have agreed to retain a candidate's details for consideration for future vacancies, these will normally be retained for up to 12 months, unless further retention is agreed and lawful.
- **Successful applicants:** Relevant information will form part of the individual's employment record and be retained in accordance with Iris's Employment Records Retention and Erasure Policy.
- **Legal or regulatory requirements:** Information may be retained for longer where necessary to comply with applicable requirements or establish, exercise or defend legal claims.

More intrusive background-check information will be retained only for as long as necessary for the relevant purpose, and screening results will be handled in accordance with applicable legal and regulatory obligations.

At the end of the applicable retention period, information will be securely deleted or anonymised.

11. Data security

Iris maintains appropriate technical and organisational measures to protect personal information against unauthorised access, accidental loss, disclosure, alteration or destruction.

Access to recruitment information is restricted to personnel who require it for legitimate recruitment, HR, management or compliance purposes.

Where third-party service providers process information on our behalf, we require appropriate contractual and security protections.

12. Your data protection rights

Subject to the circumstances and any applicable legal exemptions, you have the following rights under UK data protection legislation:

- **Right of access:** To request a copy of the personal information we hold about you.
- **Right to rectification:** To request correction of inaccurate or incomplete information.
- **Right to erasure:** To request deletion of personal information in certain circumstances.
- **Right to restrict processing:** To request that the use of your information is limited in certain circumstances.



- **Right to object:** To object to processing based on legitimate interests in certain circumstances.
- **Right to data portability:** To receive certain personal information in a structured, commonly used format where the right applies.
- **Right to withdraw consent:** Where processing is based on consent, to withdraw that consent at any time without affecting the lawfulness of earlier processing.
- **Rights relating to automated decision-making:** To exercise applicable rights where decisions with legal or similarly significant effects are made solely by automated means.

To exercise your rights, please contact us using the details below.

We will respond to requests in accordance with applicable data protection legislation.

13. Providing personal information

You are not generally under a legal obligation to provide all information requested during recruitment.

However, certain information is necessary for us to assess an application or comply with legal and regulatory requirements. Failure to provide information reasonably required for these purposes may affect our ability to progress an application or make an offer of employment.

14. Contact details and complaints

If you have any questions about this Notice, how your personal data is handled or wish to exercise your data protection rights, please contact:

Iris Insurance Brokers Limited

Email: compliance@irisib.com

Postal address: 80 Baxter Avenue, Southend on Sea, Essex, SS2 6HZ

If you are dissatisfied with the way we have handled your personal information, you may raise your concerns with us.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Information Commissioner's Office

Website: www.ico.org.uk

Complaints: <https://ico.org.uk/make-a-complaint/>

15. Changes to this notice

Iris may update this Candidate Privacy Notice from time to time to reflect changes in legislation, regulatory requirements or recruitment practices.