

# RECRUITMENT PRIVACY NOTICE

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## About GoCardless

GoCardless collects personal data to find and hire people who are a good fit for our company. You can reach us at **GoCardless Ltd, Sutton Yard, 65 Goswell Road, London, EC1V 7EN.**

### If you have a question or a problem

You can [contact the Data Protection Officer](#) to ask a question or exercise your rights or choices about our privacy practices.

If we can't resolve your concerns, you may have the right to complain to a [data protection authority](#) or other regulator where you live or work, or where you believe a breach may have occurred.

## How does GoCardless use personal data for recruitment?

Purpose	Data
<p><b>To find people who might be a good fit for our company</b></p> <p>We collect applications online and from referrals, and we use recruitment agencies, specialist websites and tools, and public websites where people might share career information.</p>	<ul style="list-style-type: none"><li>● Contact</li><li>● Recruitment</li><li>● Education &amp; skills</li></ul>
<p><b>To assess candidates and evaluate results</b></p> <p>We set up interviews and assess candidates for whether they meet the role requirements. We may talk to personal references and administer tasks or other tests to evaluate skills.</p>	<ul style="list-style-type: none"><li>● Contact</li><li>● Recruitment</li><li>● Education &amp; skills</li></ul>
<p><b>To manage recruitment travel and expenses</b></p> <p>We track business travel bookings and business expenses submitted, to have oversight over our costs and prevent misuse.</p>	<ul style="list-style-type: none"><li>● Contact</li><li>● Financial</li><li>● Government identifiers</li></ul>
<p><b>To sponsor visas and manage rights to work</b></p> <p>We use personal data to sponsor visas and take other steps needed to make sure our international workforce has the right to work.</p>	<ul style="list-style-type: none"><li>● Contact</li><li>● Recruitment</li><li>● Government identifiers</li></ul>

	<ul style="list-style-type: none"> <li>• Education &amp; skills</li> </ul>
<p><b>To conduct background checks and other screening required by our financial services licences</b></p> <p>Under the terms of our licence to operate financial services, we're required to screen our employees with background checks.</p> <p>Our regulators also require us to share information about some employees with them. Our reporting might include the results of these background checks.</p>	<ul style="list-style-type: none"> <li>• Contact</li> <li>• Recruitment</li> <li>• Background check results</li> </ul>
<p><b>To analyse the diversity of our workplace</b></p> <p>We monitor how we're doing on diversity and inclusion, in some cases – like gender pay gap or equal opportunity requirements – because it's required by law but mostly because it's the right thing to do. We make sure to collect only the information we're allowed to collect by law.</p> <p>We ask for some data about you that you can choose to willingly share, like gender identity, race, sexuality, disability and neurodiversity. We anonymise this data so it isn't linked to you.  <a href="#">Read more about diversity &amp; inclusion at GoCardless.</a></p>	<ul style="list-style-type: none"> <li>• Demographic &amp; biographic</li> </ul>

## What personal data does GoCardless use?

The information we collect for our recruitment programmes may come directly from you (for example, when you fill out an application, send a resume or complete a form). We may also collect it from recruitment agencies and platforms or from public sources like LinkedIn.

The personal data we collect and use about recruits falls into the following categories:

- **Contact information:** first name, last name, personal email, home address, phone number, previous addresses, emergency contact information
- **Recruitment information:** References, job application form, salary/wage expectations, interview notes, previous work history and other information from a CV or resume
- **Background check results,** including criminal history, sanctions watchlist results and legal proceedings history

- **Demographic & biographic data:** Ethnicity/race, nationality, education, religion, gender identity, disability, neurodiversity, number of dependents, primary caregiver, sexuality, age
- **Education & skills:** degrees, academic transcripts, training records, languages spoken, qualifications and certifications, professional memberships,
- **Financial information:** sort code, bank account number, travel & expense details
- **Government identifiers:** drivers licence number, national identification number, passport number

## How does GoCardless share and transfer recruitment data?

- GoCardless shares your data with service providers and other third parties who support our recruitment processes.
- Personal data may be shared with government authorities or law enforcement officials if required for the operation of our business, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.
- In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

We process personal data in your home office and in our headquarters in the United Kingdom. It may also be processed on the servers of our service providers in other countries, who commit to processing it to EU-level standards using approved transfer mechanisms.

## How long will GoCardless keep my data?

So that we can keep accurate records, administer our business and meet legal reporting obligations, your personal data is stored for 18 months after a recruitment decision. If you become a GoCardless employee, your personal data will be treated as employee data, and the privacy notice applicable to employee data will be communicated to you when you join.

## Legal basis for processing

In many of the countries where we operate, data protection law requires us to process personal data only where we have an approved basis under the law. You have the right to understand what our legal bases are, so we explain them here. We use the following bases, depending on the activity we undertake:

### Meeting our legitimate interests

Like all companies, we have a legitimate interest in finding, choosing and hiring employees.

When we use personal data as necessary to meet our legitimate business interests, we make sure we understand and work to minimise its privacy impact. For example, we limit the data to what is necessary, control access to the data, and where we can, aggregate or de-identify the data.

**What is legitimate interest?** Under GDPR Article 6(1)(f), companies have the ability to engage in activities without consent under a balancing test. Do we have a legitimate interest in engaging in the activity that is not outweighed by the interests or fundamental rights and freedoms of the data subject?

### Performing a contract

In some cases, the data we collect and the things we use it for are necessary for us to execute an agreement with you, for example, if we agree to reimburse you for travel costs.

### Complying with law

Some of the activities we undertake are necessary to comply with our legal and other obligations as your employer.

For example, we process personal data to:

- Report on our gender pay gap in countries where it is required
- Comply with equal opportunity laws that apply to us in some countries
- Conduct background checks and other employment screening required by our financial services licences

## Your rights and choices

You may have rights under privacy and data protection law. Depending on where you live, these include the right to ask GoCardless for a copy of your personal data, to correct, delete or restrict processing of it, and to obtain personal data in a format you can share with a new provider. You may have the right to object to processing. These

rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data.

You can [contact our Privacy team](#) to ask a question about our privacy practices or exercise your rights. If you have unresolved concerns, you have the right to complain to a [data protection authority](#) or other regulator where you live or work, or where you believe a breach may have occurred.