

CREO - Applicant Data Protection Notice

This Data Protection Notice aims to give applicants to CREO Syndicate (“**CREO**”) information on how their personal data (i.e., information which directly or indirectly identifies an applicant) (“**Applicant Personal Data**”) are processed by CREO when they apply for a role or vacancy with CREO. For the purposes of EU/UK data protection laws, CREO Syndicate and CREO Europe are the controllers of Applicant Personal Data.

Data That May Be Collected. CREO may collect certain personal data of applicants including, without limitation: (i) contact information (e.g., name, home and business address, phone numbers and email addresses); (ii) personal data (e.g., date of birth, nationality); (iii) employment and education history; (iv) employment references; and (v) any other information which may be voluntarily disclosed by the applicant in the course of the application process.

Failure by the applicant to provide personal data which is necessary for CREO to consider the application to a CREO role or vacancy and/or for CREO to comply with legal requirements, may mean CREO is unable to consider the job application and/or progress the application successfully.

Use of Applicant Personal Data. CREO may process Applicant Personal Data for the purposes set out below:

Purpose	Lawful Basis
Making a decision about the applicant’s recruitment or appointment, including the right to work	This is necessary to enter into a contract with the applicant CREO has a legal obligation to do so
Managing the recruitment process, including assessing the applicant’s skills, qualifications and suitability for the role	CREO has a legitimate interest to ensure that it appoints a suitable and qualified applicant to the relevant role or vacancy at CREO To be able to manage and perform the contract with the applicant
Maintaining records regarding the recruitment process	CREO has a legitimate interest to ensure that it maintains accurate and comprehensive records regarding the recruitment process CREO has a legal obligation to do so
Communicating with the applicant during the recruitment process	CREO has a legitimate interest to ensure that it communicates promptly and effectively regarding the recruitment process

Please note that applicants have a right to object to the processing of their personal data where that processing is carried out for CREO’s legitimate interests. However, please note that CREO may not be able to fulfil this request in all instances.

Disclosure to Certain Third Parties. CREO may disclose certain personal data for the above purposes to the following recipients: (i) to its service providers and advisors; (ii) to fraud prevention agencies and law enforcement agencies; (iii) to courts, governmental and non-governmental regulators and ombudsmen as required or permitted by law, including to comply with a subpoena or similar legal process or government request, or when CREO believes in good faith that disclosure is legally required; (iv) to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of CREO’s assets; or (iv) with other relevant third parties to otherwise fulfill the purpose of collection.

International Transfers. Where you are located in the European Economic Area (“EEA”)/UK, CREO may, for the above listed purposes, transfer Applicant Personal Data to recipients as referred to above, that are located in countries outside of the EEA/UK, including in the U.S., and which are not considered by the European Commission to provide an adequate level of data protection. Where CREO transfers Applicant Personal Data to recipients outside of the EEA/UK, CREO will enter into European Commission approved Standard Contractual Clauses with the recipient or seek assurances from the recipient that they are EU-U.S. Privacy Shield certified or have Binding Corporate Rules in place, as applicable.

Rights of Applicants. Under applicable data protection laws, applicants may have a right to (subject to certain limitations and/or exceptions): (i) request access to and rectification or erasure of their personal data; (ii) obtain restriction of processing or to object to the processing of their personal data; and (iii) ask for a copy of their personal data to be provided to them, or a third party, in a digital format. Applicants also have a right to lodge a complaint about the processing of their personal data with the relevant data supervisory authority.

Children’s Information. We do not seek applications from children under 13 years of age, and, as a general practice, we do not knowingly store personal data from such individuals. If you believe that we may have collected personal data from a child under 13 years of age, please contact us at: privacy@creosyndicate.org.

Security. We take steps to establish reasonable and appropriate administrative, technical, and physical measures designed to secure the personal data we collect from accidental loss and from unauthorized access, use, alteration, or disclosure. We take measures to safeguard your personal data.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. While we use these precautions to safeguard your personal data, please be aware that no security measures are perfect or impenetrable. Although we do our best to protect your personal data, we cannot guarantee or warrant its security. Please use caution when submitting any personal or other sensitive information to us online.

Retention. CREO will retain Applicant Personal Data for no longer than is necessary for the purposes for which CREO is processing such personal data and will securely destroy Applicant Personal Data 6 months after the application if the application is unsuccessful in accordance with CREO’s data retention practices.

Where an applicant’s application for employment is successful, the Applicant Personal Data gathered during the recruitment process will be transferred to the applicant’s personnel file and retained during the course of the applicant’s employment. The periods for which Applicant Personal Data will be held when the applicant is employed by CREO, will be provided to the applicant in a new data protection notice.

Enquiries, Requests or Concerns. All enquiries, requests or concerns regarding this Data Protection Notice or relating to the processing of Applicant Personal Data including all requests as detailed in the Rights of Applicants section above, should be sent to privacy@creosyndicate.org.