

CANDIDATE DATA PROTECTION PRIVACY NOTICE

You are being sent a copy of this privacy notice because you are applying for work with TwentyThree Studios Limited (“**TwentyThree Studios**”, “**we**” or “**us**”), as either an employee, worker or contractor.

TwentyThree Studios is a “data controller”, which means we are responsible for deciding how we collect, hold and use personal information about you. This notice is designed to make you aware of how and why your personal data will be used as part of the recruitment exercise, how long we will usually keep your information for, and other relevant information that we are required to give you under applicable data protection law (specifically the General Data Protection Regulation (*EU*) 2016/679 (“**GDPR**”) and any equivalent UK legislation).

DATA PROTECTION PRINCIPLES

We will comply with applicable data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

INFORMATION WE MAY COLLECT FROM YOU OR ABOUT YOU

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- the information you have provided to us in your curriculum vitae (CV) and CV cover sheet (if applicable);
- any information you provide to us during an interview;
- any information you provide as part of any testing we ask you to carry out as part of a job application, for example a writing/drafting exercise or any psychometric testing; and
- any other information you wish to provide to us.

As part of your application we may also collect or receive the following “special categories” of more sensitive personal information about you:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences, particularly if the role you are applying for involves working with children.

We will only collect, store and use the information listed above in the ways and for the purposes set out in this notice.

HOW WE COLLECT YOUR INFORMATION AND WHERE WE COLLECT IT FROM

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies we work with, from whom we may collect some or all of the categories of data listed above.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we may collect information relevant to your application including your job history.
- Data you have made publicly available on LinkedIn.

HOW AND WHY WE USE YOUR INFORMATION

We will use the personal information we collect about you to:

- assess your skills, qualifications, and suitability for the role you are applying for;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- if your application is unsuccessful we may wish to retain your information so we can invite you to apply for any alternative roles that we think you may be suitable for (see 'How long we keep your personal information' below);
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

Applicable laws allow us to use, or “process”, your personal information for a variety of lawful reasons. For the purposes of this notice the lawful reasons we may rely on when processing your information include:

- because it would be beneficial to us, and is therefore in our legitimate interests, to decide whether to hire, appoint or engage you to work with;
- because we need to process your personal information to decide whether to enter into a contract of employment, or a service contract (as applicable), with you at the end of the recruitment process; and
- because we need to establish, exercise or defend our legal rights, or process your information for the purpose of legal proceedings.

CONSENT

We do not generally need to get consent from you if we are processing your information under one of the lawful reasons noted above. However we may request specific written consent from you to allow us to process certain “special categories” of personal data, for example for diversity and inclusion monitoring.

If we request your written consent to allow us to process such personal information we will provide you with full details of the information that we would like and the reason we would like it, so that you can carefully consider whether you wish to consent. Please be aware that you are not obliged to give consent – it is not a condition of the recruitment process that you agree to any request for consent from us.

If you have given your consent to the specific processing of certain information then you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact info@twentythreestudios.com with “Privacy” in the Subject Line. Please note that withdrawing your consent (a) would not affect the lawfulness of any processing carried out before you withdraw your

consent, and (b) relates only to that specific processing.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If we request information that is necessary for us to consider your application (such as evidence of qualifications or work history) and you fail to provide such information when requested, we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

We may request additional information that is not necessary for us to consider your application but is useful to TwentyThree Studios for some other purpose. For example, we may request information on candidates' ethnicity, gender, sexual orientation or religion which is used for our diversity and inclusion monitoring. If we request such additional information and you do not provide it this will not affect your application. However, failure to provide such additional information may have a wider effect on TwentyThree Studios' business, for example, failure to provide diversity information may affect TwentyThree Studios' eligibility for funding.

We therefore ask that if you have any concerns about providing any information that we have requested from you please let us know so we can discuss these concerns with you as required.

HOW WE USE "SPECIAL CATEGORIES" OF MORE SENSITIVE PERSONAL INFORMATION

We will use your sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate reasonable adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We may use your sensitive personal information to create aggregate, anonymized insights and reports on our applicants for diversity and inclusion monitoring purposes. Where we do this we will ensure that no individuals are identifiable from such insights or reports.

INFORMATION ABOUT CRIMINAL CONVICTIONS AND OFFENCES

We envisage that we will process information about criminal convictions if the role you are applying for involves working with children. If the role you are applying for does not involve working with children we do not envisage that we will process information about criminal convictions.

Where required we will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular, we are legally required to carry out criminal record checks for those carrying out roles that involve working with children.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

SHARING YOUR INFORMATION

We will not share your personal information with any third parties for the purposes of processing your application.

Where we have created anonymized diversity reports based on sensitive personal information, as above, we may share those reports with third parties for reporting purposes. As noted above, we will ensure that no individuals are identifiable from any such reports that we share.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will retain your personal information for a period of six (6) months after we have communicated our decision to you about whether to appoint, hire or engage you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION THAT WE ARE HOLDING

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in an accessible digital format.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email privacy@twentythreestudios.com or jobs@twentythreestudios.com.

If you are not happy with the way we have collected and used your personal information then you also have the right to lodge a complaint with the UK Information Commissioner's Office ("ICO"). Complaints can be submitted to the ICO through the ICO helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available at <https://ico.org.uk/concerns/>.

If you have any questions about this privacy notice or how we handle your personal information, please email privacy@twentythreestudios.com or BusinessAffairs@twentythreestudios.com.

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