

Privacy

Introduction

Acorn Group Services Limited, its Subsidiaries or Holding Companies from time to time and any Subsidiary of any Holding Company from time to time, including, without limitation Acorn Insurance & Financial Services Ltd, Granite Finance Ltd, Flag Insurance (Brokers) Ltd, Carrot Risk Technologies Ltd and My Policy Limited and is committed to protecting your personal data. This privacy notice tells you how we collect and process your personal data when applying for a position to work with us.

1 Important information

- **Purpose**

This privacy notice aims to give you information about how Acorn Insurance collects and processes your personal data as a candidate for employment, in accordance with the United Kingdom General Data Protection Regulation and the Data Protection Act 2018.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

- **Controller/Processor**

Acorn Insurance and Financial Services Limited, authorised and regulated by the Financial Conduct Authority, acts as the Data Controller registered with the Information Commissioner's Officer (ICO) with registration number Z6512233. We are responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). We also act as a Data Processor, however the information in this notice reflects our use as a controller.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise any of the legal rights detailed in section 10, please contact our Data Protection team using the details set out below.

- **Contact details**

Acorn Insurance and Financial Services Limited 98 Liverpool Road, Formby, Liverpool, L37 6BS
dataprotection@theacorngroup.com

2 The data we collect and process about you

- **What this means**

Personal data, or personal information, means any information about an individual from which that person can be identified, directly or indirectly. It also includes information that relates to an individual where that information is used to learn something, evaluate something or decide something about an individual.

We may collect, use, store and transfer different kinds of personal data about you during the recruitment process which may include:

- a) Information provided within your curriculum vitae (CV) and/or covering letter (this may include details of referees or previous employers).
- b) Information you or a recruitment agency has provided to us during the application process. This includes (but is not limited to): name, title, gender, date of birth, home address, qualifications and employment history, current salary, credit history, criminal convictions, email address and telephone numbers.
- c) Information you provide to us during your interview(s).

If your application is successful, then we may also collect, use, store and transfer the following data:

- d) Information required to set up a profile within our HR system, such as bank details and next of kin.
- e) References from previous employers, educators or other professionals.
- f) Any data revealed about unspent criminal convictions as part of a criminal record check.
- g) Any data or inconsistencies revealed by a credit check.
- h) Proof of address documentation, such as a utility bill, council tax bill or bank statement.
- i) Copies of Right To Work (RTW) documentation such as a copy of your passport, visa, or other official documentation.
- j) Vulnerability data. This includes information on any vulnerabilities that you choose to share with us as part of the recruitment process. This may include Health Data which is defined as Special Category data (see below).

We collect details about your health for recruitment purposes. We process this so we can support you and provide necessary adjustments during the recruitment process.

We also collect, use and share Aggregated Data, such as statistical or demographic data, for different purposes. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your data to calculate the percentage of applicants who apply via a specific route. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the

combined data as personal data, which will be used in accordance with this privacy notice.

- **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we are negotiating with you, and you fail to provide that data when requested, we may not be able to process your application successfully (for example, if you fail to submit evidence of your qualifications when requested as part of the recruitment process, we will not be able to fully consider your application).

3 How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity or contact details in your curriculum vitae, or simply by corresponding with us by post, phone, email or otherwise during the application process.
- **Automated technologies or interactions.** If you have interacted with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also collect your data on our CCTV systems if you visit any of our offices.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties including (but not limited to):
 - a) Recruitment agencies
 - b) Credit reference agencies
 - c) The Disclosure and Barring Service
 - d) External references provided by you (i.e. previous employers or educational institutions)
 - e) Public information sources
 - f) Government and law enforcement agencies.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- ✓ When considering your application for employment or negotiating your contract
- ✓ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ✓ Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data however if we do, you have the right to withdraw consent at any time by contacting us, using the email address in section 1 of this notice.

4 Purposes for which we will use your personal data

We have set out below a description of the ways we plan to use your personal data.

Note that we may process your personal data under more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

- To assess your suitability for the role.
- To communicate with you during the recruitment process.
- To comply with legal or regulatory requirements.
- To contact you regarding similar vacancies (if consented).
- To carry out credit and background checks (if your application is successful).
- To maintain records of our hiring processes.
- For reporting and analysis to improve the recruitment process.

Automated decision-making

We currently do not use automated decision making (including profiling) in the recruitment process. If at some future date we introduce the use of automated decision making (including profiling), we will inform you of its introduction, explaining the circumstances it will be used in, the logic involved and the significance and envisaged consequences of that processing.

5 Disclosures of your personal data

We do not share personal data with any third parties except as provided below or as required by law:

- Recruitment agencies
- Referees provided by you
- Legal requirements and regulators
- Credit reference agencies and background check suppliers

In addition to the third parties we have already mentioned in this privacy notice, we may have your personal data processed by other third parties who act on our behalf; for example, we may use cloud computing or remote database hosting services and we may engage contractors for the purposes of providing support or back-office services to us,

including website hosting, application and database hosting, data processing services, or that help us manage our recruitment process. These companies will process and hold information about you to perform their functions. These companies are not authorised to use the information they process for us for any other purpose than those notified to you under this privacy notice.

- **International Transfers**

We use a cloud-based system for recording candidate data throughout the recruitment lifecycle, including through to onboarding if you are appointed. The system is provided by Dayforce EMEA Limited and they use sub-processors based outside the UK and EEA. Dayforce EMEA Limited protects your data using UK-compliant appropriate safeguards when it grants access to your data to these sub-processors. This means that you can exercise your information rights under the UK GDPR at all times.

6 Information security

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

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

7 Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

If your application is successful, we will retain your personal data for the duration of your employment and for six years thereafter. Please see our employee privacy notice for further details.

If your application is unsuccessful, we will retain your personal data for a period consistent with our retention schedule after which your data will be deleted in accordance with our retention policy. We may also ask you if are happy to extend that retention period so we can consider you for future roles.

In some circumstances you can ask us to delete your data. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8 Glossary

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and

negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we do so under a different lawful basis such as consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party. This also includes taking steps to negotiate such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

9 Your legal rights

You have the right to:

- a) **Request access to your personal data (commonly known as a "subject access request")**. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b) **Request correction of the personal data that we hold about you**. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- c) **Request erasure of your personal data. This enables you to ask us to delete or remove personal data** where there is no lawful reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- d) **Object to processing of your personal data** 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- e) **Request restriction of processing of your personal data**. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- f) **Request the transfer of your personal data** to you or to a third party. We will provide you, or a third party you have chosen, with your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- g) **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- h) **Right not to be subject to automated decision making** where we are processing your data using solely automated means that have legal or similarly significant effects. This right does not apply where the processing is necessary for entering into or performing a contract with you.
- i) **Right to be Informed** about the collection and use of your data. This Privacy Notice provides a comprehensive guide to how we use your data. If you have any questions not answered here, please do not hesitate to contact us using the contact details in section 1.

- **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

- **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- **Time limit to respond**

We respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a formal complaint about how we handle your personal data at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Information Commissioner's Office

Wycliff House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: 03303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We may amend this privacy notice at any time. This privacy notice was last updated in April 2026.