

Candidate Privacy Notice

Data controller: United Bank for Africa (UK) Limited

As part of any recruitment process, United Bank for Africa (UK) Limited (“the Bank”, “UBA UK”) collects and processes personal data relating to job applicants. The Bank is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does UBA UK collect?

UBA UK collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the Bank needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK.

The Bank collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The Bank will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. UBA UK will seek information from third parties only once a job offer has been made to you and will ask your prior permission to do so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems including email.

Why does UBA UK process personal data?

The Bank needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Bank needs to process data to ensure that it is complying with its legal and contractual obligations. For example, it is required to check a successful applicant’s eligibility to work in the UK before employment starts.

The Bank has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organization to manage the recruitment process, assess and confirm a candidate’s suitability for employment and decide to whom to offer a job. The Bank

may also need to process data from job applicants to respond to and defend against legal claims.

Where the Bank relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of job applicants, employees or workers and has concluded that they are not.

The Bank processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

For some roles, UBA UK is obliged to seek information about criminal convictions and offences. Where the Bank seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment/comply with a regulatory requirement to establish whether an individual has committed an unlawful act or been involved in dishonesty or other improper conduct.

The Bank will not use your data for any purpose other than the recruitment exercise for which you have applied.

As an employee of UBA UK, all CCTV images are captured for your personal and UBA UK's safety and security.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy.

The Bank will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Bank will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

As an employee of UBA UK, CCTV images are shared with our CCTV service provider.

To what other countries does UBA UK Transfer Data?

Once your employment with UBA UK starts, there may be a need to transfer your personal data to United Bank for Africa Plc ("UBA Plc") in Nigeria. This will only be done via a Chapter V Safeguard.

How does UBA UK protect data?

The Bank takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does UBA UK keep data?

If your application for employment is unsuccessful, the Bank will hold your data on file for a period of up to 6 months after the end of the relevant recruitment process. At the end of that period [or once you withdraw your consent], your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

As an employee of UBA UK, all CCTV images are deleted on a rolling 30-day cycle.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Bank to change incorrect or incomplete data;
- require the Bank to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Bank is relying on its legitimate interests as the legal ground for processing; and
- ask the Bank to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the Bank's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Bank's Chief Technology Officer.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner -

<https://ico.org.uk/global/contact-us/>

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to UBA UK during the recruitment process. However, if you do not provide the information, the Bank may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.