



PRIVACY NOTICE FOR CANDIDATES

What is the purpose of this document?

Firebrand Training Limited is registered in the UK. It operates as a wholly separate business but is part of the BPP Professional Education Group. (UK). BPP carry out recruitment activities on behalf of Firebrand Training Ltd and have a data sharing agreement in place with them. You can read BPP's privacy notice here.

BPP Holdings Limited is the parent company of several different BPP companies within the UK and Channel Islands, including:

BPP Actuarial Education Limited / Actuarial Education Company Limited	BPP (CI) Limited
BPP Learning Media Limited	BPP Professional Education Limited
BPP Services Limited	BPP University Limited

(together referred to as the “**BPP Professional Education Group**”).

This privacy notice is issued on behalf of the BPP Professional Education Group, so when we mention “BPP”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the BPP Professional Education Group responsible for processing your data (i.e., the company you are applying to – in this case it will be both BPP Professional Education Ltd and Firebrand Training Ltd). Please note that in addition to its presence in the UK Firebrand Training Limited is also the parent of companies in

For ease of reference, this Notice shall refer to all companies within the Firebrand Group (including Firebrand Ltd (UK) and those Firebrand companies located in Europe) as Firebrand.

During the recruitment process both BPP and Firebrand act as a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being provided with a copy of this privacy notice because you are applying for a role with Firebrand (whether as an employee, worker or freelancer). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

We need to collect and process your data as part of the recruitment process. All such personal data will be collected and processed in accordance with the requirements of the relevant Data Protection Laws and Regulations. Specifically, this means all laws and regulations, including laws and regulations applicable to the processing of personal data, the General Data Protection Regulation (EU 2016/679), the United Kingdom retained EU law version of Data Protection Act 2018 (and regulations made thereunder), and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426); as they may be amended, modified, or replaced from time to time.

Data protection principles

These principles lie at the heart of our approach to processing personal data:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

The kind of information we hold 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 and covering letter.
- The information you have provided on any application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and reasons for wanting to work for Firebrand.
- Any information you provide to us via any social networking sites such as LinkedIn.
- Any information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about criminal convictions and offences. This data will only be processed with your explicit consent or where required or permitted by applicable laws.
- We also collect data to assess and/or to comply with our obligations under the Equality Act 2010 (for example a requirement to make reasonable adjustments to your working conditions). This may include Information about your race or ethnicity, religious beliefs and sexual orientation.
- For occupational health reasons or where we are assessing your working capability, subject to appropriate confidentiality safeguards. This may include information about your physical or mental health, or disability status, to assess whether any reasonable adjustments are required for you during the recruitment process, and, where you are successful in your role application, carrying out any medical assessment required for your role, pension and any insurance benefits.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate (including through BPP's Talentsoft candidate area).
- Recruitment agencies that you have engaged to assist you in finding a role.
- The 'Tribepad' system which is a recruitment and applicant tracking platform used by BPP. You can read Tribepad's Privacy Notice [here](#).
- Background check providers and credit reference agencies, namely Agenda Screening Services who carry out candidate background and credit checks on behalf of BPP.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we collect the following categories of data: information about your past employment/education and experience, including relevant dates and any comments on your performance.
- Publicly accessible sources such as LinkedIn, Reed, CV-Library and Total Jobs from which we collect further information about your education or employment history.

LinkedIn Recruitment and Targeted Advertising

BPP utilises LinkedIn's Ad Targeting services through LinkedIn's website. LinkedIn may therefore target BPP advertisements to you based on information collected about you through LinkedIn's website. This consists of profile information including current/former industry experience, current/former job titles, key skills required (and listed on profiles) and current location information. Additionally, LinkedIn may use device identifiers obtained on and off their services for advertisement services, including to determine which devices you may use and to serve advertisements to you on your different devices.

How we will use information about you

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

- Assess your skills, qualifications, and suitability for the advertised role. We may also retain a copy of your curriculum vitae/covering letter/application if we think you may be suitable for future roles. In which case we may also assess your suitability for a future role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the advertised role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract (whether of employment, for services or a freelancer contract) with you.

Having received your curriculum vitae/covering letter/application, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and, depending on the nature of the role, carry out any necessary further checks (such as criminal record checks) before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), 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.

How we use particularly sensitive (special category) personal information

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

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview. This information is voluntary.
- We will use information about your race or national or ethnic origin, religious, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. We should highlight that this information is voluntary and would be processed securely by BPP's HR Team. This information would not form part of your application or be passed to the hiring manager.

Information about criminal convictions

Depending on the nature of the role we may process information about criminal convictions.

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 (in respect of roles which involve working with children) or entitled 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:

- Any role which involves working with children (such as some tutor positions) is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) so is eligible for an enhanced check from the Disclosure and Barring Service.
- Any role which requires a high degree of trust and integrity (for example if it involves dealing with client or customer money) and so we would like to ask you to seek a basic disclosure of your criminal records history.

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.

Data sharing

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: members of the BPP Professional Education Group, Agenda Screening Services and any recruitment agency you have engaged on your behalf. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

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.

Transferring information outside the UK/EU

We may transfer your personal data outside the UK and or the EU. If we do, you can expect a similar degree of protection in respect of your personal data.

To ensure that your personal data does receive an adequate level of protection we have put in place appropriate measures, including carrying out appropriate due diligence on all suppliers and using UK/EU Commission approved contracts, to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the EU and UK data protection laws. If you require further information about this, you can request it from the Legal Team (dataprotection@bpp.com).

Data retention

How long will you use my information for?

With the exception of personal information stored on BPP's Talentsoft candidate area, we will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to the advertised role. 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 our data retention policy.

We may 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 and contact you regarding your interest in the role. In this case we will still retain your information for a period of 12 months before securely destroying it. If you are not happy for us to retain your information for this purpose, you can let us know in writing at any time.

We will retain your personal information stored on BPP's Talentsoft candidate area until there has been 12 months of inactivity on the account (for example, where you have not logged in or made changes to your account), after which time it is automatically deleted. Should you wish to delete your personal information stored on BPP's Talentsoft candidate area sooner, you can do so through BPP's Talentsoft candidate area directly, or by contacting BPP as detailed below.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

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.

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 contact dataprotection@bpp.com.

Right to withdraw consent

When you apply for a role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To

withdraw your consent, please contact dataprotection@bpp.com Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Data protection officer

Both BPP and Firebrand have appointed respective data protection officers (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact; dataprotection@bpp.com or dpo@firebrandtraining.com You have the right to make a complaint at any time to:

- the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk);
- the Data Protection Commissioner, the supervisory authority for data protection issues in Guernsey (www.dataci.gg); or
- the Office of the Information Commissioner, the supervisory authority for data protection issues in Jersey (www.dataci.je).