

## Privacy Notice for Candidates

**Last updated: 2<sup>nd</sup> September 2025**

At Unity Trust Bank plc, (“**the Bank**” “**we**” “**us**” “**our**” or “**ours**”) we are committed to protecting and respecting your privacy. We take the protection of your personal information seriously.

### Our Commitment

Our Privacy Notice explains our approach to collecting, storing and processing your personal information, your rights and how to get in touch with us if you have any further questions.

### Who does this apply to?

This Privacy Notice applies to personal information relating to your application for employment or engagement if you are a prospective employee, worker or contractor of the Bank.

### Controller

Unity Trust Bank plc, a company incorporated in England and Wales under company no: 1713124, registered office: Four Brindley Place, Birmingham, B1 2JB, is a "controller" in relation to your personal data. 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 work with us (whether as an employee, worker or contractor). This notice makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment process, pre-employment vetting, and how long your personal data will usually be retained for. It also provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

### Data protection principles

We will comply with 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.

### Contact Us

-  Call us: **0345 140 1000\*** Unions: **0345 245 0020\***
-  Email us: **us@unity.co.uk**
-  Visit us: **unity.co.uk**



\*Our call centre is open Monday to Friday 9am-5pm, excluding bank and public holidays in England or Scotland. Calls are charged at local rate. Unity Trust Bank plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Unity Trust Bank is entered in the Financial Services Register under number 204570.

- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## Who is your personal information collected from?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment and search agencies, from which we collect documents you provide to them and they subsequently forward to us e.g. your CV.
- Experian, who we may instruct to carry out background checks on our behalf.

Experian will use the following agencies to gather information about you on our behalf as part of your pre-employment vetting process:

- Disclosure Barring Service in respect of criminal convictions.
- Credit reference agencies.
- CIFAS fraud databases.
- International sanctions databases.
- FCA register.
- SP Index.
- Companies House.
- Your named referees.
- Educational institutions.
- Professional bodies.

## 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:

- Personal details including name, gender, date of birth, address, telephone number, personal email address.
- If you are applying directly to the Bank or via a third party, we will receive a copy of your CV as part of the recruitment process. All applications are processed via our HR system provided by Talos360.
- The information you have provided on our application form, including education history, qualifications and employment history.
- We might ask you to complete tests or occupational personality profile questionnaires and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes.
- Records of correspondence and other communications between us, including email.
- If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks with Experian who carry out our background screening checks. The information required will include contact details, proof of identity, national insurance number, previous employment experience and employment gaps, education, proof of your qualifications, referees and for answers to

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questions relevant to the role you have applied for. You will be asked to complete a declaration disclosing issues relating to your financial solvency and adverse credit history, court judgments, previous directorships and company filing history (if applicable). Only our People Excellence Team will have access to this information. Sometimes we outsource this activity (e.g. to Experian) and you may be asked to provide your details to them for background checks.

- Evidence of your right to work in the United Kingdom, either directly or via Experian.
- We might carry out enhanced vetting for certain high-risk positions within the Bank. This enhanced vetting will take place during the recruitment process and periodically throughout your employment. If your role is classified as one requiring enhanced vetting, you will need to successfully complete several checks to our satisfaction before or shortly after starting the role. During the recruitment process, we will inform you of any specific vetting requirements relevant to the position you are applying for.

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

- Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions. This information is optional, and it is your choice to provide it.
- Information about your health, including any medical condition, health and sickness records.
- Information about unspent criminal convictions and offences.

### What will we do with the information you provide to us?

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

- Assess your skills, qualifications, and suitability for the 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.

### Why do you collect this information about me?

Under data protection law, a data controller is only permitted to process your personal data if they have a valid purpose for doing so. Our purpose for processing your data must fall into one of the prescribed categories listed under the law.

The categories for which the Bank processes your data are set out below:

- We need your personal data in order to take steps to enter into a contract with you.
- We have a legitimate interest in deciding whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role. We also have a legitimate interest to keep records of our recruitment process as well as defend ourselves against any legal claims.

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- We may be required to process your data for the purpose of complying with our legal obligations for example in the UK we are required to carry out eligibility to work checks before a candidate can begin employment.
- Where we have obtained your consent to process your data. In exceptional circumstances we may rely on vital interest where you are incapable of providing consent such as in the case of an onsite emergency situation.

## How we use particularly sensitive personal information

Where appropriate we will use your particularly sensitive personal information in the following ways:

- We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview. Where we use such sensitive categories of personal data processing will be necessary for the purposes of our rights and obligations, and your rights and obligations in the field of employment and social security and/or to protect your vital interests where you are incapable of giving consent.
- We use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting. Where we use such sensitive categories of personal data processing will be necessary for the purposes of our rights and obligations, , and your rights and obligations in the field of employment and social security.

Under the law this information is referred to as “special category data.” We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## Information about criminal convictions

We may request information about criminal convictions if it is appropriate (i.e. for regulated roles) and where we are legally able to do so. We may also collect information about criminal convictions to meet our legal obligations in connection with your employment.

Where applicable we will instruct Experian to carry out Basic or Standard Criminal Record check via the Disclosure and Barring Service which will verify your declaration of unspent convictions (and spent convictions where a standard check is required i.e. regulated roles within the Senior Managers Certification Regime (SMCR).

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.

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## How do we make decisions about recruitment?

Final recruitment decisions are made by hiring managers and members of our People Excellence team. All information gathered during the application process is considered. Testing is marked manually by the People Excellence team.

If you want further information on the decision taken, you can speak to your contact within our People Excellence team or email [hr@unity.co.uk](mailto:hr@unity.co.uk)

## 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:

- Recruitment and search agencies. Please contact the relevant agency and ask to see their privacy notice if you require more information.
- HR system providers such as Talos 360 to co-ordinate our recruitment process.,
- Background check providers such as Experian. Here is a link to Experian's [privacy notice](#) for more information about how they may process your information.

We require all third parties who process personal data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow such third-party processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes.

## 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 upon our instructions, and they are subject to a duty of confidentiality.

## International Transfers

We only store your personal information in the UK and our suppliers do not send personal information outside the EEA.

Whenever we transfer your personal data out of the UK, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- ensuring that the country the personal data is transferred to have been deemed by the UK to provide an adequate level of protection for personal data; or

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- using specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK.

## How long will you retain my information for?

If you are successful in your application, we will keep your data in accordance with our data retention policy. If you have applied for a job with us, and are unsuccessful, we will retain your personal information in our internal IT systems and recruitment files for a period of 3 months after we have communicated our decision to you. All other personal data held by our third-party HR system provider and Experian will be retained for a period of 2 years.

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.

## Your right to withdraw consent

You have the right to withdraw your consent to the collection, processing and transfer of your personal information for specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information unless we have another legitimate basis to do so in law. This will not affect the lawfulness of processing based on consent before its withdrawal.

## Your rights

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

- **Request access** to your personal information (commonly known as making 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 rectification** 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.

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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. We will handle any request to exercise your rights in accordance with applicable law.

If you wish to exercise any of these rights, please write to us at: [hr@unity.co.uk](mailto:hr@unity.co.uk) or

PO BOX 7207 – People Excellence ONLY  
Planetary Road  
Willenhall  
WV1 9DN

Please ensure you include the subject line 'Personal information request' and supply the following details:

- First name(s) & surname
- Address & postcode
- Details of the type of information you are seeking
- Proof of Identity – this needs to be a document containing a photograph and signature such as a driving license.

In your request, please make clear what right you would like to exercise. Providing us with this information will help us to quickly identify and deal with your request.

If this is unclear, we will contact you to discuss your request.

### **What should you do if you wish to make a complaint or raise a query about the way your data is being processed?**

The Bank aims to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you wish to make a complaint about the way we have processed your personal information, you can contact the Data Protection Manager at the Bank providing details of your complaint and your full name and contact details. If you are unhappy with the response received or wish to seek further guidance, you can also raise your concerns with the statutory body which oversees data protection law, Information Commissioners Office – [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

### **Changes to our Privacy Notice**

We regularly review our Privacy Notice and will publish any updates on our webpage. This notice was last updated on the date as set out at the top of this Privacy Notice.

### **Contacting us?**

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If you have any questions, or feedback about this Privacy Notice, please get in touch with our Data Protection Manager:

Email: [dpo@unity.co.uk](mailto:dpo@unity.co.uk)

Call: 0345 140 1000

Write to us at: Unity Trust Bank, PO Box 7193, Planetary Road, Willenhall, WV1 9DG

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