

**BROMPTON ASSET MANAGEMENT GROUP  
RECRUITMENT PRIVACY NOTICE**

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# BROMPTON ASSET MANAGEMENT GROUP RECRUITMENT PRIVACY NOTICE

## 1 Introduction

### 1.1 Purpose

This notice is to inform individuals going through the recruitment process (candidates) with Brompton Asset Management Holdings Limited (Brompton) about what personal data Brompton collects and how and why it is processed, in accordance with Brompton's obligations under applicable data protection laws (**DP laws**). Please note that this document will be reviewed periodically and when necessary. In the event of changes, an updated version will be included on our website, noting the date that it was amended.

Any questions about this notice should be directed to [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

### 1.2 Scope

This notice applies to all processing of personal data related to candidates by Brompton in its capacity as controller of that personal data and, as appropriate, by those operating on its behalf as processors.

### 1.3 Interpretation

In this notice, we use definitions from the General Data Protection Regulation (GDPR) unless otherwise stated.

**Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

The **UK General Data Protection Regulation (UK GDPR)** is the UK's retention of the European Union's **General Data Protection Regulation (GDPR)** in UK law. The UK GDPR sits alongside the **Data Protection Act 2018 (DPA 2018)**. The DPA 2018 enacts the GDPR into UK law.

**Personal data** means any information relating to an identified or identifiable natural person, namely one who can be identified directly or indirectly from that information alone or in conjunction with other information 'in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person'.

**Processing** means 'any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction'.

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**Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Special categories of personal data** are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data or biometric data for the purpose of uniquely identifying a natural person and data concerning health or data concerning a natural person's sex life or sexual orientation.

**Transfers** mean the transfers of personal data either to third countries outside the EU or international organisations. These are organisations and their subordinate bodies governed by public international law and any other body set up by, or on the basis of, an agreement between two or more countries.

**UK DPA** means the UK Data Protection Act 1998, which will be replaced by the GDPR and, it is proposed, the UK Data Protection Bill, which is passing through Parliament at the date of this document.

## **2 The notice**

Brompton is committed to compliance with DP laws in the processing of candidates' personal data by or on behalf of Brompton.

For any processing of personal data, we will consider:

- whether the processing activity is necessary and transparent;
- whether there is an applicable legal basis for the processing;
- whether the processing activity is fair to the candidate; and
- whether the processing activity is proportionate to the concerns raised.

Where processing results in a likely high risk, we will carry out a data protection impact assessment (DPIA) under the Privacy Impact Assessment (PIA) & DPIA Policy.

This notice applies when Brompton is the controller regarding the processing of your personal data.

### **2.1 *What candidate personal data we collect***

We collect a range of personal data about a candidate for our legitimate business purposes and in accordance with DP laws. The personal data collected will depend on the nature of the role and how far the candidate progresses through the recruitment process.

The personal data may include;

- contact details such as name, address, email and phone number;

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- career, qualification and education details such as CVs and cover letters, employment history, which may include previous salary details, references, information on qualifications and exam passes; and
- other data you or your referees choose to share with us.

We may also collect personal data you manifestly choose to make public, including via social media.

In some cases, the nature of the role may require us to undertake a criminal reference check. In such cases, you will be informed before the check is undertaken and you will need to consent to the check. As part of this process, we will need to receive copies of proof of identity and address. We have a policy on the hiring of ex-offenders which is included as an appendix to this notice.

Please also note the following:

- any email sent or received from the Brompton domains is retained for at least seven years in line with regulatory requirements;
- calls to and from Brompton, including in some cases calls from mobile phones, may be recorded and monitored, with recording of such calls retained for at least five years; and
- Brompton reserves the right to monitor the usage of the guest WiFi by visitors to our offices. Brompton will not accept any responsibility for any individual identified as having breached the current or future copyright laws and reserves the right to pass on individuals' contact information to the appropriate authorities if requested.

### *2.2 How we collect your personal data*

Most of the personal data we hold about you will be provided to us by you or the recruitment consultant introducing you.

We may also obtain personal data about you from other sources such as previous employers, third-party websites and social media platforms.

### *2.3 Why we process your personal data*

We process your personal data for our normal business purposes as an employer in assessing if you are suitable for the relevant role or position.

### *2.4 Legal bases for processing your personal data*

There are two main legal bases on which we will process your personal data:

- the processing is necessary as part of the recruitment process before we can enter into a contract with you; and
- the processing is necessary to fulfil our legal obligations.

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We may sometimes need your consent in relation to your personal data, for example in obtaining a criminal reference check. Where this is the case, we will ask for your consent before the processing of that data occurs and we will provide you with the information you need to make an informed decision. You can withdraw your consent at any time. Such withdrawal of consent will not invalidate any processing or sharing of your information undertaken before that time. Please note this will not prevent us processing or sharing information with a third party where we rely on another lawful process to process such information.

### **2.5 *Automated decision-making, including profiling***

Subject to certain exceptions as described below, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Circumstances where this does not apply include:

- where such processing is necessary for entering into or performing a contract with you such as an employment contract;
- where such processing is authorised by EU or other applicable law; and
- where it is based on your prior, explicit consent, which may always be withdrawn.

We do not, however, at the date of this document, make such decisions based on or carry out such profiling. If we intend to in future, we will provide you with advance notice as required by DP laws, including the GDPR.

### **2.6 *Sharing***

We share your personal data with third parties to the extent necessary for the relevant purpose, including without limitation:

- contractors and service providers we use for our business operations, for example recruitment services and IT providers;
- other Brompton staff and entities;
- parties with whom we are in negotiations for any sale or purchase of a business unit;
- to comply with any legal or regulatory obligation such as tax reporting to HM Revenue & Customs; and
- to comply with a court or other legally-binding order or decision by a competent authority.

Where we do share your personal data, we will ensure appropriate measures are in place to safeguard your personal data.

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### *2.7 Transfers*

We will share your information with third parties and service providers including operators of our IT infrastructure. If it is processed within a country covered by the UK's 'adequacy regulations', such as the European Economic Area (EEA), your information will be protected by the same data protection standards as those to which we are subject.

Where we transfer your information to countries not covered by UK adequacy regulations, we take appropriate measures to ensure that:

- such transfers are in accordance with data protection laws; and
- appropriate safeguards are in place to protect your personal data.

### *2.8 Security*

We take protection of your personal data seriously, as we do with the protection of all personal data we process. We implement appropriate technical and organisational measures to ensure a level of appropriate security.

### *2.9 Retention*

We are committed to retaining personal information only for as long as needed to fulfil the purpose or purposes for which it was collected and for as long as we are required or permitted to keep it by law.

We will process your data during the recruitment process and will retain this information for an appropriate amount of time after the process ceases. The period of retention will depend on the outcome, our legitimate business needs and other legal or regulatory rules that may require us to retain this data for a minimum period. There may also be legal, regulatory or risk-management requirements to retain data, including where relevant for any potential litigation.

Where we process personal data with your consent, we process the data until you ask us to stop and for a reasonable period afterwards to allow us to comply with your request.

Where we no longer need to hold your personal data, we will take appropriate steps to delete or remove your personal information from our system or make such information beyond use, in accordance with our retention policy.

Typically, if you receive and accept an offer of employment from Brompton, we will retain your personal data and provide you with an employee privacy notice as part of your employment contract.

Typically, if you do not receive an offer, if you decline an offer or otherwise the recruitment process is ended, your personal data may be retained for a short period, usually less than 1 year, before it is deleted.

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### *2.10 Your rights*

You have certain rights under DP laws. In particular, you may;

- know if Brompton is processing your personal data;
- access a copy of the data;
- have errors rectified;
- request the erasure data;
- restrict data processing and/or object to processing;
- object to automated decision-making including profiling; and
- transfer data to another person.

You have the right to withdraw any consent you have provided and to object to processing of your personal data for direct marketing.

You also have the right to complain to the Information Commissioner's Office, whose website address is <https://ico.org.uk>, although we would hope we would have the opportunity to resolve any such issue rapidly with you. To exercise your rights or to learn more, please contact [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

## **3 Contact**

If you have any questions about the content of this notice or require additional information about our privacy policy, please email us at [privacy@bromptonam.com](mailto:privacy@bromptonam.com).

## **BROMPTON ASSET MANAGEMENT GROUP RECRUITMENT PRIVACY NOTICE**

### **Appendix 1 - Policy on the recruitment of ex-offenders**

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), the Group complies fully with the [code of practice](#) and undertakes to treat all applicants for positions fairly.

The Group undertakes not to discriminate unfairly against any current or prospective member of staff subject to a criminal record check on the basis of a conviction or other information revealed.

The Group can only ask an individual to provide details of convictions and cautions that we are legally entitled to know about. The Group can only ask an individual about convictions and cautions that are not protected

The Group is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

The Group has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

Subject to meeting its regulatory obligations, the Group actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal record. The Group selects all candidates for interview based on their skills, qualifications and experience.

An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, the recruitment brief will confirm that this is the case and candidates will be advised.

The Group ensures that the relevant staff in the Group who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. The Group also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. The Rehabilitation of Offenders Act 1974

At interview, or in a separate discussion, the Group will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

The Group makes every subject of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and makes a copy available on request.

The Group undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment or taking any other action.



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### **Version control**

<b>Version</b>	<b>Date</b>	<b>Updated by</b>	<b>Description</b>
1	21.05.18	Chessy Smith	Initial version
2	Nov 19	Chessy Smith	Updated to expand on criminal record checks and include policy on hiring ex-offenders
3	Sept 23	Rebecca Fodder	Minor refresh and amends for the UK GDPR
4	May 2025	Chessy Smith	