



Privacy Statement

For job applicants and employees of RIFT Group (the “Company”)

The Company’s commitment to your privacy

The Company is committed to protecting and respecting your privacy rights. This privacy statement (“**Statement**”) tells you about the use that the Company will make of the personal information we hold about you, how we will collect certain personal information, under what circumstances we may share or otherwise use the information and who we may disclose it to.

What personal data do we collect about you, why and how do we collect it?

As your employer and data controller, we need to keep and process information about you for employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. We are able to legally process a majority of the information you have provided, as well as information obtained from other source, for example your reference, in order to fulfil our employment contractual obligations. Please see table below for more information regarding the processing of your data.

| Type of Data | Stage Collected | Why Collected | Legal Basis | How Collected | Shared with 3 rd Party (Privacy Statements are linked where applicable) |
|---|--------------------------|--|---|--|--|
| Personal data e.g. name, contact details, address, CV including employment & educational history | Job Application Stage | <ul style="list-style-type: none">• For identification purposes• In order to assess suitability for the role• In order to contact candidate to give feedback or arrange an interview | On the grounds of the company’s legitimate interests, for example in order to fill a vacancy and provide employment | Email and hard copies – by the Company and 3 rd parties | No - however recruitment agencies or job boards may have shared this information with us. <ul style="list-style-type: none">• Reed.com• Total Jobs• Indeed.com• Jobs in Kent |

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|--|--|--|--|---|---|
| <p>Personal data (e.g. name, DOB, contact details including email address, address), CV including employment & educational history, passport/Visa.</p> | <p>Conditional offer of employment stage</p> | <ul style="list-style-type: none"> • This information is needed in order to make a formal offer of employment • We need to see documentation that confirms a candidate’s right to work in the UK • Previous educational and employment history helps the hiring manager determine whether the candidate is suitable for the job • Personal details such as name and address are needed in order to form a contract and the address is needed for identification purposes | <p>Necessary for the performance of the contract of employment ; legitimate interest as your future employer</p> | <p>Email and hard copies - by the Company</p> | <p>Most information is only shared between hiring manager and HR at this stage.</p> <p>However, in some cases we might have to share any right to work documentation with UK Visas & Immigration (Home Office).</p> |
| <p>Personal Data (as above, including; national insurance number, nationality, marital status, gender, salary, date joined the company, bank details, holiday dates)</p> | <p>Post offer acceptance stage</p> | <ul style="list-style-type: none"> • For the purpose of pre-employment screening in order to carry out checks and obtain references to confirm employment & educational history • For those wanting to take up certain benefits, this information will be passed over to the relevant provider (In the case of The People’s Pension, we must fulfil our legal obligation by passing over personal data for pension Auto Enrolment. We will not be able to provide benefits without transferring certain data to 3rd parties. This would include the addition of any dependants or partners (and their data) to medical or life insurance) • To fulfil contractual obligations in the form of paying your salary • To be used in the case of a remuneration review • For identification purposes • In order to make assessments on your performance or conduct for performance management purposes (including performance appraisals, development and formal performance/conduct improvement action) • To provide information to relevant external | <p>Necessary for the performance of the contract of employment; legitimate interest as your employer</p> | <p>Email, hard copy and online portal - by the Company and by 3rd parties</p> | <ul style="list-style-type: none"> • Aviva • WPA • IND Healthcare • AiMS Financial • The Hub (Reward Gateway) • BreatheHR • Org Chart Now • Sage Payroll • Teamseer • The People’s Pension • UK Government agencies including HMRC, ICO and Financial Regulators FCA & PRA |

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| | | agencies in regards to earnings and deductions including tax and National Insurance | | | |
| Special Category Data (sickness/absence, ethnicity, physical/mental health condition, criminal offences or convictions) | Post offer acceptance stage | <ul style="list-style-type: none"> In order to monitor and put initiatives in place if necessary (e.g. diversity and inclusion) In order to manage ill health absence and other absence and maintain associated records In order to comply with the obligations under the Equality Act 2010 | Legitimate interest and a duty of care as your employer | Email and hard copies - by the Company | No |
| Personal data - as above | Post-Employment Stage | <ul style="list-style-type: none"> Legal obligation or statutory requirement In order to provide employment references to future employers | | Email, hard copy and online portal - by the Company | <ul style="list-style-type: none"> Relevant Court of competent jurisdiction External parties asking for a reference (where there is no legal or statutory requirement employee/ex-employee consent is required) |

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

At all times, the Company will ensure that the personal or special category data is processed in accordance with our instructions and in circumstances which require the recipient to observe industry standard security measures in respect of personal data. The Company may also be under a duty to disclose or share your personal data in order to comply with a legal or regulatory obligation, where such disclosure is required by HMRC, the FCA, the PRA, the police or a court of competent jurisdiction. The Company **will not** disclose or transfer personal data about you to third parties for the purposes of marketing.

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The personal data that we collect about you may be transferred to, and stored at, one or more countries outside the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA, who work for the Company or for our third parties. In such cases, the Company will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under the EU General Data Protection Regulation and as described in this Statement. If the Company cannot ensure such an adequate level of data protection, your personal data will only be transferred outside the EEA if you have given your prior consent to such transfer.

| Provider | Shared outside of the EEA |
|--------------------------------------|---|
| Reed Online Ltd | YES - Reed.co.uk 's own servers are all hosted within the EEA. Whilst they use third parties outside of the EEA as part of their technology ecosystem, they ensure these are compliant with all current legislation and that information is subject to security levels governed by the EEA regulations. |
| Total Jobs | NO – However if a recruiter is based outside of the EEA, CV’s would need to be forwarded outside of the EU. However, this would only be done after receiving explicit consent of the job seeker who is the data subject and ensuring the third party is GDPR compliant. |
| Jobs in Kent | NO – However if a recruiter is based outside of the EEA, CV’s would need to be forwarded outside of the EU. However, this would only be done after receiving explicit consent of the job seeker who is the data subject and ensuring the third party is GDPR compliant. |
| Aviva | NO |
| WPA | YES – WPA’S wholly owned subsidiary: WPA World Class Services (India) Private Limited [“WCS”] is located outside of the EEA in India however is independently certified by BSI to ISO 27001. Further, WCS is subject to a separate executed GDPR compliant agreement between it and WPA. As to purpose, WCS performs a back office function on WPA’s behalf. No data is stored in India. |
| IHS Healthcare | NO |
| AiMS Financial | NO |
| Reward Gateway | NO |
| BreatheHR | NO – unless someone logs in outside of the EEA |
| Org Chart Now | NO |
| Sage Payroll | YES – Sage may transfer your information to service providers outside the EEA for the purpose of providing their applications and services. Steps are taken to ensure that where your information is transferred outside of the EEA by Sage service and hosting providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations. |
| Teamseer | NO |
| The People’s Pension | NO |

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How long is the information retained for?

Your personal information shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The data retention period shall respect all local and international laws and regulations; this will include (but not be limited to):

- Financial regulations;
- Human Resources laws;
- Technology laws;
- Industry regulations;
- Other laws, after consultation with Legal.

If you are successful in your application to join the Company, as a general rule the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for up to 6 months.

Your rights under the EU General Data Protection Regulation

You have the right to access personal data we hold about you and to request rectification or erasure of such personal data, or to request its transfer. Where you have consented to the processing of your personal data, for example, opting for the benefits portal, you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn. Below is a short description of each of your rights:

Right of access – you have a right to request access to your personal data, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how it is processed. All of your personal information is stored on BreatheHR; this is a self-serve digital database for employee information which you will have access to via a unique log in. You have the right to apply for access to the information we hold about you that is not stored on BreatheHR. You simply need to send your request in writing, via email, to peopleteam@riftgroup.com

Right of rectification (correction) – in certain circumstances you have a right to ask for your personal data to be corrected if it is inaccurate, and completed if it is incomplete.

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Right to be forgotten – in certain circumstances, you can ask to have your personal data erased. It is unlikely to be possible to accept your request if, for example, RIFT has a legal duty or legitimate interests to retain or process your information.

Right to restriction of processing – if certain conditions apply, you have a right to restrict the processing of your information. This includes when you contest it as being inaccurate (until the accuracy is proved); if you have objected to the processing (when it was necessary for legitimate interests) and RIFT is considering whether its legitimate interests override your own; if you consider that the processing is unlawful (and if this is true) so that you can oppose erasure and request restriction instead; or if RIFT no longer need the personal data for the purposes they held it but you require them to continue to hold it to establish, make or defend legal claims.

Right of portability – in certain circumstances, you have the right to move, copy or transfer your personal data to another organisation or to yourself. This right is only relevant if personal data is being processed based on consent (or for performance of a contract) **and** is done automatically. This right is different from the right of access and the types of information you can get under the two separate rights may be different. Using the data portability right, you cannot get all the personal data you can get using the right of access.

Right to object – in certain circumstances, you have the right to object to certain types of processing of your personal data. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Automated decision making – RIFT does not make automated decisions when processing employee or applicant data.

For more information, please refer to the Data Protection Policy. You may address your requests to the Company's Data Protection Officer (dkennedy@RIFTgroup.co.uk).

Changes to this Statement

The Company reserve the right to change this Statement and any other relevant policies or procedures at any time without notice to you. This Statement will be held on our online HR system and is available to all employees via their unique log in at <https://www.breathehr.com/> - any changes we may make to this Statement will be reflected within this document. You are advised to regularly check and review the Statement to ensure you understand how we may be processing your personal or special category data. Any changes the Company may make to this Statement (which will, unless otherwise indicated, apply to any personal data already obtained by the Company before the changes were made) will be effective from the date on which those changes have been updated. Where appropriate, the Company may also notify you of any changes made by e-mail.

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Complaints or queries

For the purposes of the data protection legislation, the Company is the data controller. If you have any questions on the Statement, please contact the Company's Data Protection Officer (dkennedy@RIFTgroup.co.uk).

Where you are dissatisfied with any aspect of our handling of your personal data, you have a right to lodge a complaint with the Information Commissioner's Office: www.ico.org.uk/concerns

Last Updated: 25th May 2018

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