

Job applicants Fair Processing Notice (FPN)

1. [Identification and contact details of the Data Controller](#)
2. [General information: description of the information contained in the Fair Processing Notice](#)
3. [Necessary and up-to-date information](#)
4. [Data Subject rights exercise](#)
5. [Detailed information on the processing carried out](#)
 - 5.1. [If you are Job Applicant](#)
 - 5.2. [If you have filed a claim or exercised a right](#)
6. [Confidentiality](#)
7. [Update of the Fair Processing Notice](#)

1. Identification and contact details of the Data Controller

Hughes Insurance Services Limited, trading as Hughes Insurance, is a broker authorised and regulated by the Financial Conduct Authority, registered in England and Wales, No. 4451375, with registered office at 20 Fenchurch Street, London, EC3M AW and head office registered at Strangford House, 4 Jubilee Road, Newtownards, Co Down, BT23 4WN, member of the Liberty Mutual Insurance Group (hereinafter "Hughes Insurance" or the "Broker") is the data controller for the personal data that is processed in order to manage your candidacy for the vacancy as a job applicant. This clause provides information on how Hughes Insurance will use your personal data.

In addition, the purpose of this Fair Processing Notice is to provide information on the processing of personal data and the rights under the UK General Data Protection Regulation or "GDPR" and the Data Protection Act 2018 ("DPA 2018") and any other applicable law regarding data protection to job applicants who file a claim or exercise a right.

Hughes Insurance has a Data Protection Officer appointed before the Information Commissioner's Office (ICO),) under no. Z6923387 who can be contacted at the following address Hughes Insurance, Strangford House, 4 Jubilee Road, Newtownards, BT23 4WN or by sending an email to dataprotection@hughesinsurance.co.uk. If you have any questions regarding the processing of your personal data, please contact the Data Protection Officer at the aforementioned address.

2. General information: description of the information contained in the Fair Processing Notice

In this Fair Processing Notice you will find tables identifying each of the different processing's carried out by Hughes Insurance.

These informative tables will detail:

- The purposes of the processing of your personal data, i.e., the reason why Hughes Insurance processes your personal data.
- The legal basis that allows the processing of data by the Hughes Insurance for each of the purposes indicated.
- The possible communication of your data to third parties, as well as the reason for such communication. To this end, we inform you that we do not transfer your personal data to third parties except where there is a legal obligation to do so (Tax Authorities, Judges and Courts, Governmental bodies, PSNI, etc.), or for communicating them to other companies of the Liberty Mutual Group for managing internal administration and managing recruiting processes, never for commercial purposes, or when expressly indicated in the table below. On the other hand, Hughes Insurance data processors may also have access to your personal data, i.e. service providers that have access to your personal data for the performance of their services. The service providers who will have access to your personal data would be, in general, information system service providers, technological and telecommunication service providers, cloud computing and network security service providers, human resources management service providers, fraud prevention service providers, as well as social network service providers. The table below will indicate those other areas for which Hughes Insurance service providers may have access to your personal data. You can request more detailed information about the recipients of your data by sending an e-mail to dataprotection@hughesinsurance.co.uk, indicating the specific processing activity about whose recipients you would like information.
- The existence of potential international data transfers. For these purposes, much of our processing activities require the transfer of data internationally to technological service providers or entities of the group to which Hughes Insurance belongs, located in the European Union and United States of America (USA), for which the UK Addendum to the pertinent Standard Contractual Clauses or the UK International data transfer (IDTA) apply, or the recipient country is recognized as providing adequate safeguards, including Adequacy Decisions, by the ICO. You can request more detailed information regarding the international transfers of your data or the guarantees applied by sending an e-mail to dataprotection@hughesinsurance.co.uk, indicating the specific processing activity about which you would like to receive information regarding the guarantees applying.

- The retention period of the data you provide us with. For this purpose, we keep your personal data for the time necessary for the purposes for which they were collected, namely one or three years depending on the success of the recruiting process. Subsequently, your data will remain blocked during the prescription periods of the legal actions determined by the applicable regulations. You can request more detailed information regarding our data retention notice by sending an e-mail to dataprotection@hughesinsurance.co.uk, indicating the specific processing activity about which you would like to receive information on its retention.

3. Necessary, up-to-date and accurate information

Hughes Insurance will process personal data, including sensitive data such as health data, in those cases established by law, provided directly by the interested party or obtained by other lawful means. Data may be received from third parties, such as recruitment companies, professional networks such as LinkedIn, people or other entities recommending the candidate.

The personal data processed can be found among the non-exhaustive list of the following categories: identification data, nationality, date and place of birth, degree of disability, incapacity, work skills, bank account information, personal, professional and emergency contact details, address data, data relating to professional experience, training or similar (e.g. CV, references, ...), and data relating to the prevention of money laundering and criminal records, if required by the vacancy. Job title and location, division, department, grade, working hours, absenteeism (other than sickness), assigned tasks and projects, supervisor's identity, business travel, training and talent management information. Performance assessments and reviews (including employee profile), disciplinary measures and procedures, details of grievances and complaints and information on the consequences thereof, date of starting and termination, entry and exit interview, and other similar data. Base salary, incentives, commissions and bonuses, benefits (including information about you and your dependents or beneficiaries) and accrued salary information. Information may be provided directly by the job applicant or generated in the course of the recruitment process, including voice and/or image, and information relating to the use of devices such as equipment, systems and other company resources.

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with (as appropriate), your application. Likewise, by fulfilling and sending the required information, you declare that the information and data you have provided is accurate and true.

To ensure that the information provided is always up to date and does not contain errors, you must inform Hughes Insurance, as soon as possible, of any modifications and amendments to your personal data that may occur by sending an email to dataprotection@hughesinsurance.co.uk or contacting Hughes Talent Team through the contact points set up for job applicants in each office.

4. Data Subject rights exercise

You can exercise the following rights:

1. right of **access** to your personal data to find out if it is being processed, and if so, what exactly is being processed and the specific processing activity that is being carried out, including the purposes, categories of data processed and recipients, among other information;
2. right to **rectification** of any inaccurate personal data;
3. right of **erasure** of your personal data when, among other reasons, it is no longer necessary for the purposes for which it was collected, and provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is not a legal obligation;
4. right to **object** to the processing of your personal data, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is the legitimate interest of Hughes Insurance or a third party. Hughes Insurance will stop processing your data unless a compelling or higher legitimate interest for the processing is proven, or in case they are simply kept blocked for the formulation, exercise or defense of claims;
5. the right to request the **restriction** of the processing of your personal data where the accuracy, lawfulness or necessity of the data processing is in question, in which case we may retain the blocked data for the exercise or defense of claims;
6. the right to **portability** of your data, i.e., to receive your personal data in a structured, commonly used and machine-readable format, in order to transmit them to you or to another data controller, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table in [section 5](#), is the existence of a contractual relationship or your consent;
7. the right not to be subject to **automated** decisions that may affect on your legal rights, or that significantly affect you and when such decisions are being made;
8. right to revoke the **consent** given to Hughes for the processing of your data, provided that the legitimate basis that enables us to process your data, from among those indicated in the second column of the table included in [section 5](#), is your consent.

You can exercise your rights at any time and free of charge by sending an email to dataprotection@hughesinsurance.co.uk or at Hughes Insurance, Strangford House, 4 Jubilee Road, Newtownards, BT23 4WN.

In addition, you have the right to lodge a complaint with Hughes Insurance or the Information Commissioner’s Office (ICO) if you believe that there has been a breach of data protection legislation in relation to the processing of your personal data.

5. Detailed information on the processing carried out

5.1 If you are a job applicant

Purpose of the processing	Lawful basis	Recipients
<p>Recruitment of new staff. This processing includes collection of information on job applicants to be reviewed and considered during the selection process, as well as performing background checks.</p> <p>All job applicants will undergo adverse financial checks (history of bankruptcy) and basic criminal record check in order to detect crimes related to fraud or financial matters. In addition, prospective staff may also be subject to psychometric testing to assess the competencies of job applicants.</p> <p>For the purposes above, it may be necessary to process job applicants’ health data only in situations provided for by law, e.g. if it is necessary to adapt the workplace, or for insurance reasons.</p>	<p>Depending on the specific action:</p> <ul style="list-style-type: none"> (i) Job applicant’s consent; (ii) Managing the pre-contractual relationship; (iii) Compliance with legal obligations. 	<p>Your data may be transferred within the framework of this processing to auditors and credit reporting companies.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be recruitment agencies and consultancy service providers.</p>

5.2 If you have filed a claim or exercised a right

Purpose of the processing	Lawful basis	Recipients
<p>Complaints and queries about the job applicant relationship with Hughes Insurance: handle, investigate and solve complaints through communication and contacting channels made available to job applicants.</p>	<p>Hughes Insurance legitimate interest in attending to complaints and queries.</p>	<p>Your data may be transferred within the framework of this processing to official bodies, ombudsman or public authorities involved in the complaint submitted.</p> <p>The categories of service providers that may have access to your data in addition to those indicated in section 2, which are call recording service providers.</p>
<p>Complaints and queries regarding the job applicant relationship with Hughes Insurance: attend to and manage complaints regarding privacy and the exercise of the data subject right of access, rectification, erasure, objection, restriction and portability through the corresponding forms or communication channels provided for this purpose by Hughes Insurance.</p>	<p>Legal obligation to deal with privacy complaints or exercise of rights of access, rectification, erasure, objection, restriction and portability rights raised by job applicants of Hughes Insurance.</p>	<p>Your data may be transferred within the framework of this processing to the ICO.</p> <p>The categories of service providers that may have access to your data in addition to those indicated in section 2, which are call recording service providers.</p>

6. Confidentiality

The personal data that we may collect through our websites, forms, contact mailboxes, as well as through the various electronic or telephone communications that we maintain with you will be processed confidentially by Hughes Insurance, with Hughes Insurance pledging to keep this secret in accordance with the provisions of applicable Law.

7. Update of the Fair Processing Notice

This Fair Processing Notice may need to be updated. It is therefore necessary that you review this notice periodically and, if possible, every time you contact us, or access [Hughes Insurance Website](#), in order to be properly informed about the type of information collected and its processing. This Fair Processing Notice is effective as of May 2023.