

JOB APPLICANT FAIR PROCESSING NOTICE
("NOTICE")

Contents

1. What is this document and why should you read it?	2
2. Our data protection responsibilities	2
3. What types of personal data do we collect and where do we get it from?	2
4. What do we do with your personal data and why?	3
5. Sensitive Information	3
6. Who do we share your personal data with, and why?	4
7. Where in the world is your personal data transferred to?	5
8. How do we keep your personal data secure?	5
9. How do we communicate with you?	5
10. How long do we keep your personal data for?	5
11. What are your rights in relation to your personal data and how can you exercise them?	6
12. Updates to this notice	6
13. Where can you find out more?	6
Schedule 1 - Categories of Personal Data	7
Schedule 2 - Processing Activities and Lawful Basis	11
Schedule 3 - Sensitive Information - Processing Activities and Lawful Basis	21
Schedule 4 - Your Rights in relation to Personal Data	25

1. **What is this document and why should you read it?**

This privacy notice explains how and why the Financial Conduct Authority (also referred to as “**the FCA**”, “**we**”, “**our**” and “**us**”) uses personal data about individuals that apply to become employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers of the FCA (referred to as “**you**”).

You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

This notice does not form part of any contract with you (including any contract of employment that may be offered) or any other contract to provide services.

2. **Our data protection responsibilities**

“**Personal data**” is any information that relates to an identifiable natural person. Your name, address, contact details and CV are all examples of your personal data, if they identify you.

The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

The FCA is a so-called “**controller**” of your personal data. This means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

3. **What types of personal data do we collect and where do we get it from?**

We collect many different types of personal data about you for lots of reasons. We cannot administer your application without your personal data. Where we don’t need your personal data, we will make this clear, for instance we will explain if any part of an application form you are required to complete is optional and can be left blank.

Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.

You provide us with personal data when you correspond with us and apply for a job with us (for example, by completing an application or making an enquiry via the FCA website). We also obtain some personal data from other sources, and create some personal data ourselves (for example, our notes of your performance throughout the application process will contain personal data about you).

Please note: if you use the FCA website to engage with the FCA or apply for a vacancy, our processing of your personal data will be also conducted in accordance with our Website Privacy Policy – a copy of which can be found here: <https://www.fca.org.uk/privacy>. There may be some overlap with the processing conducted in accordance with this notice and the Website Privacy Policy. Therefore, we would encourage you to review both.

As set out in the table at **Schedule 1**, we collect your personal information from you directly and sometimes we obtain it from other people and organisations, including some public sources, such as publically available directories and online resources, your previous employers, your use of our systems and platforms, and your (or our) recruitment agent (as applicable).

Due to the type of work conducted by the FCA, we also perform background checks on our Applicants. Depending on the job role, these checks can relate to any criminal convictions that you may have and your credit reference history. These checks include those checks that are required by applicable law and those required for our own policy compliance. Please see also the section below in relation to 'Sensitive Information'.

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting

4. **What do we do with your personal data and why?**

We process your personal data for particular purposes in connection with your application or engagement with us, and the management and administration of the FCA.

We are required by law to always have a so-called "lawful basis" (i.e. a reason or justification) for processing your personal data. There are **six** such permitted lawful basis for processing personal data.

The table at **Schedule 2** sets out the purposes for which we process your personal data and the lawful basis on which we rely for that processing.

Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it,

if you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

Please note that we do not use your personal data to make any decisions about you which are solely based on automated decision making.

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including producing statistical research and reports. For example, demographic information by location.

5. **Sensitive Information**

Some of the processing described in the table at **Schedule 2** will include the processing of 'special categories of personal data' and/or sensitive personal data (together, "**Sensitive Information**"). This refers to sensitive or special categories of personal data (please see the relevant section of the table at **Schedule 1** or more details), which we are required to process with more care, in accordance with applicable data protection laws.

The table at **Schedule 3** sets out the different purposes for which we process your Sensitive Information and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

6. **Who do we share your personal data with, and why?**

Sometimes we need to disclose your personal data to other people.

Within the FCA:

Sometimes we will need to share your personal data internally within the FCA, including with HR, recruitment and payroll, potential line manager, managers in the business area in which you work and IT staff. Such access to your personal data is for our general business and workforce management purposes and, in some cases, for authorisations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis. Access rights are limited and granted only on a need to know basis, depending on job functions and roles.

Outside the FCA:

From time to time we may ask third parties to carry out certain business functions for us, such as IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data and we will enter into a written contract imposing appropriate security standards on them.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, where the relevant disclosure is:

- (a) if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees or others; and
- (b) in connection with a sale, purchase or transfer of all or part of a business, we may disclose or transfer your personal data to the prospective seller, buyer or transferor and their advisors.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- (a) recruitment agencies appointed by you or us;
- (b) consultants and professional advisors including legal advisors and accountants;
- (c) courts, court-appointed persons/entities, receivers and liquidators;
- (d) trade associations and professional bodies;
- (e) insurers; and
- (f) governmental departments, statutory and regulatory bodies including the Department for Work & Pensions, Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

7. **Where in the world is your personal data transferred to?**

We may transfer your personal data to recipients (as set out above) that are established in jurisdictions other than your own. Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction.

If any disclosures of personal data referred to above require your personal data to be transferred from within to outside the European Economic Area, we will only make that transfer if:

- (a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- (b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- (c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- (d) you explicitly consent to the transfer.

8. **How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. We will also ensure that third parties to whom we disclose your personal data will also take appropriate security measures to protect your personal data.

9. **How do we communicate with you?**

We will use your personal data to contact you in relation to the progress of any applications that you make with us and to respond to any other questions, comments or complaints that you may raise.

From time to time, we will also send you information in relation to other roles and vacancies which may be of interest. Such communications will only be sent with your consent (where this is required by law) and you will be given the opportunity to opt-out of receiving such communications at any time.

10. **How long do we keep your personal data for?**

If you are successful in your application, we will keep your personal data during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.

In some cases, including if you are unsuccessful in your application, we will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

- (a) any laws or regulations that we are required to follow;
- (b) whether we are in a legal or other type of dispute with each other or any third party;
- (c) the type of information that we hold about you; and
- (d) whether we are asked by you or another regulatory authority to keep your personal data for a valid reason.

Any personal data contained in any work related correspondence or records may be retained for longer, dependant on the retention period of the file that your personal data is held on. For more information on our data retention practices, please refer to the [FCA Data Retention Policy](#).

11. **What are your rights in relation to your personal data and how can you exercise them?**

You have certain rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

Where our processing of your personal data is based on your **consent** (please see **Schedules 2 and 3**), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

If you wish to exercise any of these rights please contact Dataprotection-individualrightsrequests@fca.org.uk in the first instance.

You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

12. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will notify you on material changes to this notice via the FCA careers website . We also encourage you to check this notice on a regular basis.

13. **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact Dataprotection-individualrightsrequests@fca.org.uk.

Our Data Protection Officer

As a public authority we are required to appoint a Data Protection Officer ("**DPO**"), who assists us monitor internal data protection compliance, informs and advises us on our data protection obligations, advises us on our data protection impact assessment process and acts as our contact point with the Information Commissioner. Our DPO is Andy Cobbett.

SCHEDULE 1

CATEGORIES OF PERSONAL DATA

Type of personal data	Collected from
1. Contact Information	
<ul style="list-style-type: none">• Name(s)• Address(es)• Email address(es)• Contact details including mobile telephone number(s)	<ul style="list-style-type: none">• You
2. Personal Information	
<ul style="list-style-type: none">• Contact information (see above), as relevant• Date of birth• Gender• Next of kin or other dependants• Marital or relationship status• Lifestyle and social circumstances• Emergency contact information• Online identifiers (including IP address) from your use of our website	<ul style="list-style-type: none">• You
3. Identity and Background Information	
<ul style="list-style-type: none">• Contact information (see above), as relevant• Details of education and qualifications and results• Career history, experience and skills• Passport information• Driving licence information• Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)• Curriculum Vitae (CV) or resume• Educational certificates or other qualification evidence• Image or photographs	<ul style="list-style-type: none">• You• Recruitment consultants and agencies• Your previous employers• Publicly available information from online resources• UK Security Vetting

Type of personal data	Collected from
<ul style="list-style-type: none"> • Application form • Evaluative notes and decisions from job interviews • Preferences relating to job location and salary • Conflicts of interests (including where related to family networks) • Background checks relating to criminal records (see also Sensitive Information) and credit score • Most recent five years of employment references and/or education (including evidence of gaps - that can include travelling evidence, bank statements as proof of no income) • Verification of highest academic and professional qualifications • Credit check • Confirmation of the individual's address and Right to work in the UK • Shared Intelligence System (SIS) check for no adverse results • A due diligence declaration • Government Security Clearance or Developed Vetting where relevant • Confirmation of fitness to work - service via Axa health screening 	<ul style="list-style-type: none"> • Educational Institutions • Equifax • Disclosure and Barring Service
4. Financial Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Bank account details • Previous and/or offered salary, compensation and other remuneration information • National insurance number and/or other governmental identification numbers • Tax codes 	<ul style="list-style-type: none"> • You • Your previous employer • HMRC
5. Sensitive Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Racial or ethnic origin (including your nationality and visa/right to work in the UK information) • Religious or philosophical beliefs • Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term 	<ul style="list-style-type: none"> • You • Your use of FCA security control systems • Disclosure and Barring Service

Type of personal data	Collected from
absence) <ul style="list-style-type: none"> • Sexual orientation • Health and safety and accident records and reports • Information relating to actual or suspected criminal convictions and offences 	
6. Applicant Administration Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Offered terms and conditions of employment • Your working preferences and feedback in relation to the FCA and our staff • Your preferences in relation to our use of your personal data 	<ul style="list-style-type: none"> • You
7. Application Performance Information	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • Interview notes, appraisals, and associated feedback 	<ul style="list-style-type: none"> • You • FCA / Resource Solutions staff conducting interviews and administrating the application process
8. Investigation, Grievance and Complaints	
<ul style="list-style-type: none"> • Contact information (see above), as relevant • FCA investigations records • Grievance records • Employment tribunal records 	<ul style="list-style-type: none"> • You • FCA staff conducting interviews and administrating the application process • Third parties, as permitted by applicable law

Type of personal data	Collected from
<p>9. Asset, Systems and Platform Usage and Communications Information</p> <ul style="list-style-type: none"> • Contact information (see above), as relevant • Access logs and usage records from document management systems and other FCA provided applications and technologies • User IDs and password information • IP addresses and device identifiers • Relevant records of calls, messages and/or internet or other data traffic and communications 	<ul style="list-style-type: none"> • You • Your use of FCA assets, systems and platforms
<p>10. Security, Location and Access Information</p> <ul style="list-style-type: none"> • Contact information (see above), as relevant • Information (including image) captured or recorded by electronic card access systems, CCTV and other security control systems 	<ul style="list-style-type: none"> • You • Your use of FCA security control systems

SCHEDULE 2

PROCESSING ACTIVITIES AND LAWFUL BASIS

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
a) Recruitment and workforce planning						
1. Developing, operating and collecting feedback on recruitment activities and employee selection processes	<ul style="list-style-type: none"> • Personal Information • Identity and Background Information • Application Performance Information 	<p align="center">✓ (where this is for purposes other than in the public interest, we will obtain your consent)</p>			✓	
2. Administering your application for a job with us and considering your suitability for the relevant role	<ul style="list-style-type: none"> • Personal Information • Identity and Background Information • Application Performance Information 	✓				
3. Obtaining, considering and verifying your employment references and employment history	<ul style="list-style-type: none"> • Identity and Background Information • Application Performance Information 				✓	

		Lawful basis				
		We are permitted to process your personal data because...				
Purposes of processing	Categories of personal data	You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
4. Reviewing and confirming your right to work	<ul style="list-style-type: none"> Identity and Background Information 			✓		
5. Conducting verification and vetting, including criminal background checks and credit checks where required by law (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Identity and Background Information Sensitive Information 			✓		
6. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Identity and Background Information Sensitive Information 	✓ (where such checks involve the processing of sensitive information your consent may be required)			✓	
7. Making a job offer to you and entering into a contract of employment with you	<ul style="list-style-type: none"> Personal Information Financial Information Applicant Administration Information 		✓			

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
8. Identifying and assessing the FCA's strategic business direction, resourcing needs and areas for development	<ul style="list-style-type: none"> Applicant Administration Information Application Performance Information 			✓	✓	
9. Promotion and succession planning	<ul style="list-style-type: none"> Applicant Administration Information Application Performance Information 				✓	
10. Analysing recruitment and retention objectives, processes and employee turnover rates	<ul style="list-style-type: none"> Applicant Administration Information Job Performance Information 				✓	
b) General Applicant management and administration						
11. Communicating with you and providing you with information in connection with your application or engagement with us from time to time	<ul style="list-style-type: none"> Personal Information 	✓	✓			✓
12. General staff administration, including workforce management	<ul style="list-style-type: none"> Employment Administration Information 		✓		✓	

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
and facilities operations	<ul style="list-style-type: none"> Asset, Systems and Platform Usage and Communications Information 					
13. Managing our health and safety compliance obligations (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Applicant Administration Information Sensitive Information 			✓		
14. Determining whether any adjustments are necessary to enable you to carry out a role offered to you (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Personal Information Sensitive Information 		✓	✓		
15. Considering your suitability for existing and future vacancies	<ul style="list-style-type: none"> Personal Information Application Performance Information 	✓			✓	
16. Handling grievances and complaints, including investigating issues, considering appropriate resolution and mitigating	<ul style="list-style-type: none"> Investigation, Grievance and Complaints 			✓	✓	

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
actions and reviewing outcomes						
17. Responding to feedback requests from you or your recruiter	<ul style="list-style-type: none"> Applicant Administration Information Application Performance Information Investigation, Grievance and Complaints 	<p>✓ (where this is for purposes other than in the public interest, we will obtain your consent)</p>			✓	
c) Security and governance						
18. Monitoring the security of the FCA's physical premises and systems, networks and applications	<ul style="list-style-type: none"> Security, Location and Access Information 			✓		
19. Identifying and authenticating Applicants and other individuals (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Security, Location and Access Information Sensitive Information 				✓	
20. Identifying, investigating and mitigating suspected misuse of the FCA's assets, systems and platforms	<ul style="list-style-type: none"> Asset, Systems and Platform Usage and Communications Information 			✓		

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
(Note: please also see Schedule 3)	<ul style="list-style-type: none"> Security, Location and Access Information Sensitive Information 					

d) Legal and regulatory compliance and responsibilities

21. Managing and administering our equal opportunities reporting (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Sensitive Information 			✓		
22. Establishing and potentially contacting an emergency contact for individuals in case of emergency (Note: please also see Schedule 3)	<ul style="list-style-type: none"> Personal Information Security, Location and Access Information 				✓	✓
23. Responding to binding requests or search warrants or orders from courts, governmental, other regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
24. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: please also see Schedule 3)	Potentially all categories of personal data	✓ (where this is for purposes other than in the public interest or where the processing includes your Sensitive Information, we may require your consent)			✓	
25. Complying with disclosure orders arising in civil proceedings (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		
26. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting the FCA's compliance with relevant legal and regulatory requirements (Note: please also see Schedule 3)	Potentially all categories of personal data			✓		

Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
27. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting the FCA's compliance with best practice and good governance responsibilities (Note: please also see Schedule 3)	Potentially all categories of personal data	✓ (where this is for purposes other than in the public interest or where the processing includes your Sensitive Information, we may require your consent)			✓	

e) Day-to-day business operations

28. Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make the application process easier or more enjoyable	<ul style="list-style-type: none"> • Applicant Administration Information • Investigation, Grievance and Complaints • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information 				✓	✓
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Purposes of processing	Categories of personal data	Lawful basis				
		We are permitted to process your personal data because...				
		You have given your consent to the processing	It is necessary to perform a contract with you	It is necessary for us to comply with a legal obligation	It is necessary for performance of a task in the public interest	It is necessary to protect your vital interests (or those of someone else)
29. Managing, planning and delivering our global business strategies	<ul style="list-style-type: none"> • Application Administration Information • Application Performance Information 				✓	
30. Supporting and maintaining our technology infrastructure	<ul style="list-style-type: none"> • Asset, Systems and Platform Usage and Communications Information • Security, Location and Access Information 		✓		✓	
31. Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business (Note: please also see Schedule 3)	Potentially all categories of information			✓	✓	

SCHEDULE 3

SENSITIVE INFORMATION – PROCESSING ACTIVITIES AND LAWFUL BASIS

Purposes of processing	Sensitive Information - lawful basis					
	You have given your explicit consent to the processing	We are permitted to process your personal data because...			It is necessary for reasons of substantial public interest	It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
		It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims		
a) Recruitment and workforce planning						
1. Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓ (where The substantial public interest basis does not apply)				✓ (where such checks are required under law or pursuant to regulatory guidance)	
b) General application management and administration						
3. Managing our health and safety compliance obligations		✓			✓	
4. Determining whether any adjustments are necessary to enable you to carry out a role		✓			✓	
c) Security and governance						
5. Identifying and authenticating applicants and other individuals	✓ (where the legal claims or substantial public			✓ (where such processing is necessary to	✓ (where such checks are required under	

Purposes of processing	Sensitive Information - lawful basis					
	You have given your explicit consent to the processing	We are permitted to process your personal data because...				It is necessary for reasons of substantial public interest
		It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest	It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee
	interest basis do not apply)			detect or prevent an unlawful act)	law or pursuant to regulatory guidance)	
6. Identifying, investigating and mitigating suspected misuse of the FCA's assets, systems and platforms				✓		
7. Establishing and potentially contacting an emergency contact for individuals in case of emergency	✓	✓				
d) Legal and regulatory compliance and responsibilities						
8. Managing and administering our equal opportunities reporting					✓	
9. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓		
10. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities	✓					

Purposes of processing	Sensitive Information - lawful basis					
	You have given your explicit consent to the processing	We are permitted to process your personal data because...				It is necessary for reasons of substantial public interest
		It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	It is necessary for our establishment, exercise or defence of legal claims		
11. Complying with disclosure orders arising in civil proceedings				✓		
12. Investigating, evaluating, demonstrating, monitoring, improving and reporting on the FCA's compliance with relevant legal and regulatory requirements				✓		
13. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting the FCA's compliance with best practice and good governance responsibilities	✓ (where this is for purposes other than in the public interest or where the processing includes your Sensitive Information, we may require your consent)✓			✓	✓ (where such processing is necessary to detect or prevent an unlawful act or to comply with law or regulatory guidance)	
e) Day-to-day business operations						
14. Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of or by another business	✓ (where this is for purposes other than in the public interest or where the processing includes your Sensitive Information, we may require your consent)					

SCHEDULE 4

YOUR RIGHTS IN RELATION TO PERSONAL DATA

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a " <i>data subject access request</i> ").	<p>If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.</p> <p>We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other staff.</p>
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	<p>If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.</p> <p>This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (ie not for paper records). It covers only the personal data that has been provided to us by you.</p>
Rights in relation to inaccurate personal or incomplete data	<p>You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.</p> <p>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.</p>	<p>Please always check first whether there are any available self-help tools to correct the personal data we process about you.</p> <p>This right only applies to your own personal data. When exercising this right, please be as specific as possible.</p>
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	

Right to erasure

Subject to certain conditions, you are entitled to have your personal data erased (also known as the "**right to be forgotten**"), eg where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.

We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.

Right to withdrawal of consent

As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.

If you withdraw your consent, this will only take effect for future processing.