

MAPFRE ASISTENCIA

**PRIVACY NOTICE FOR JOB APPLICANTS
AND WORK EXPERIENCE PARTICIPANTS**

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1 INTRODUCTION

- 1.1 MAPFRE Asistencia Compañía Internacional de Seguros y Reaseguros, Sociedad Anónima (referred to as “we” or MAPFRE Asistencia in this agreement) is committed to protecting the privacy and security of your personal information.
- 1.2 This notice applies to all applicants who have applied to be engaged (whether temporarily or permanently) by, or to carry out work experience or a work placement with, the UK branch of MAPFRE Asistencia (or any UK subsidiary, UK holding company or subsidiary of that UK holding company).
- 1.3 This notice also applies to you during any work experience or work placement you carry out with the UK branch of MAPFRE Asistencia (or any UK subsidiary, UK holding company or subsidiary of that UK holding company).
- 1.4 This privacy notice describes how we collect and use personal information about you during and after the application process, and during and after any work experience or work placement you undertake with us.
- 1.5 If your application to be employed or engaged by MAPFRE Asistencia (or any UK subsidiary, UK holding company or subsidiary of that UK holding company) is successful and you are employed or engaged as an employee, worker or contractor of MAPFRE Asistencia (or any UK subsidiary, UK holding company or subsidiary of that UK holding company), your personal information will be collected, used and retained in accordance with our Privacy Notice for Employees, Workers and Contractors, a copy of which is available upon request.
- 1.6 This is a policy document only and does not have contractual effect. We may update or amend this notice at any time.
- 1.7 For more information about our approach to data protection, please see our Information Security Policy, Data Privacy and IT Security Guidelines, and Acceptable Use Policy, which can be obtained from the HR team.
- 1.8 The contents of this privacy notice and our Data Privacy and IT Security Guidelines, and Acceptable Use Policy are overseen by our Chief Security Officer, whose name and contact details are set out below:

Jon Forrow – JFORROW@MAPFRE.COM

2 THE KIND OF INFORMATION WE HOLD ABOUT YOU

- 2.1 We may collect, store, use and share information about you in order to process your application, to assess your suitability for the position or placement you have applied for, to carry out our activities as a business, and to carry out our obligations as a prospective employer or a prospective work experience/work placement provider.
- 2.2 If your application for work experience or a work placement is successful, we may also collect, store, use and share information about you in order to carry out our activities and obligations as a work experience or work placement provider.
- 2.3 In particular, we will process personal data for the purposes of complying with legal obligations, performing the contract we have entered into with you, pursuing our legitimate interests (or those of a third party), where you have consented to it or where the law otherwise permits or requires it.
- 2.4 We may also use your personal information where we need to protect your interests (or someone else’s interests) or where it is needed in the public interest, but this is likely to be rare.

2.5 The table at Schedule 1 sets out the type of information we may collect and what it may be used for.

2.6 The table at Schedule 2 sets out the additional types of information we may collect and what it may be used for if you undertake work experience or a work placement with us.

3 HOW YOUR PERSONAL INFORMATION IS COLLECTED

3.1 We collect personal information about applicants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies, other background check agencies including the Disclosure and Barring Service and regulators.

3.2 During any work experience or work placement you undertake with us, we may also collect personal information about you in the course of work-related activities throughout the period of your work experience or work placement with us.

4 HOW WE WILL USE INFORMATION ABOUT YOU

4.1 Most commonly, we will use your personal information in the following circumstances:

- (a) where we need to perform any contract we have entered into with you;
- (b) where we need to comply with a legal obligation;
- (c) where we consider it necessary for our legitimate interests (or those of a third party).

4.2 The tables at Schedule 1 and Schedule 2 set out the type of information we may collect and what it may be used for, but some of the grounds for processing referred to in that table will overlap and there may be several grounds which justify our use of your personal information.

4.3 If you fail to provide certain information when requested, this may prevent us from being able to process your application and/or to enter into a contract with you and/or to perform any contract we have entered into with you, or we may be prevented from complying with our legal obligations.

4.4 Please note that we may process your personal information without your knowledge or consent, in accordance with this privacy notice, where this is required or permitted by law.

4.5 Data protection legislation identifies certain “special categories” of data, including information about race or ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, medical conditions, genetics, biometrics and criminal convictions. We may use such information in the following ways:

- we may use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process or during any work experience or work placement you undertake with us;
- we may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting;

4.6 We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law.

4.7 We will usually only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally permitted to do so. Where appropriate, we may collect information about criminal convictions as part of the recruitment process.

- 4.8 We do not envisage that any decisions will be taken about you using automated means. We will notify you in writing if this position changes.

5 DATA SHARING

- 5.1 We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have a legitimate interest in doing so.
- 5.2 We will only share your personal information with the following third parties for the purposes of processing your application and employment contract: Disclosure Scotland, Experian, Southern Comms, Payroll SDWorx, Employee Benefits Perkbox, Pension Aviva, Life Assurance Zurich, Salary Continuation Metlife, Tilney Broker, Offsite Archive, Medical Insurance Axa.
- 5.3 We may share your personal information with other entities in our group, for example for system maintenance support and for hosting of data. For example Mapfre IT Spain and Mapfre Global HR System.
- 5.4 We may also share your personal information with other third parties, for example if a business transfer or change of business ownership takes place or is envisaged. In addition, we may need to share your personal information with a regulator or otherwise to comply with the law.
- 5.5 If you undertake work experience or a work placement with us, we may also share your personal information with the following third parties: Mapfre Global HR System, Mapfre IT Spain, Disclosure Scotland, Experian
- 5.6 Our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 5.7 We may transfer personal information about you to the EEA and outside of the European Economic Area (EEA). To ensure that your personal information receives an adequate level of protection if it is transferred outside of the EEA, we will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

6 DATA SECURITY

- 6.1 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 aim to limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

7 DATA RETENTION

- 7.1 If your application is unsuccessful, unless you expressly confirm to us such longer period (so that you may be considered for future vacancies) we will retain your personal information for six (6) months after we have communicated to you our decision concerning your application. We retain your personal information for that period so that we can demonstrate that the recruitment exercise has been carried out in a fair and appropriate way.
- 7.2 After that period, we will securely destroy your personal information in accordance with our Records Management and Data Retention Policy and Procedures and applicable laws and regulations.

- 7.3 If your application for work experience or a work placement is successful, unless you expressly confirm to us such longer period (so that you may be considered for future vacancies) we will retain your personal information for six (6) months after your work experience or work placement ends, after which we will securely destroy your personal information in accordance with our Records Management and Data Retention Policy and Procedures.
- 7.4 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- 7.5 As noted above, if your application to be engaged by MAPFRE Asistencia (or any of its subsidiaries or associated entities) is successful and you are engaged as an employee, worker or contractor, your personal information will be collected, used and retained in accordance with our Privacy Notice for Employees, Workers and Contractors, a copy of which is available upon request.

8 YOUR DUTY TO INFORM US OF CHANGES

- 8.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the application process and during any work experience or work placement you carry out with us.

9 YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

- 9.1 Under certain circumstances and subject to certain conditions, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you.
- **Request correction** 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.

- 9.2 You will not usually have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances.

9.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

9.4 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing. To withdraw your consent, please contact Jon Forrow on JFORROW@MAPFRE.COM. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so in law.

10 HOW TO OBTAIN MORE INFORMATION ABOUT YOUR RIGHTS

10.1 If you have any questions or concerns about how we handle your personal information, please contact the HR team on HR.UK@MAPFRE.COM.

10.2 If you are unsatisfied with our response to any data protection issues you raise with us, you have the right to make a complaint to the Information Commissioner's Office (ICO). The ICO is the authority in the UK which is tasked with the protection of personal data and privacy.

11 CHANGES TO THIS PRIVACY NOTICE

11.1 We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

Schedule 1

Applicants

TYPE OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING	WHAT IT MAY BE USED FOR
Personal contact details such as name, title, address, telephone numbers and personal email address	Fulfil our legitimate interests (or those of a third party) Compliance with our legal obligations	To contact you and to verify your identity
Date of birth	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	For equal opportunity monitoring and reporting, and to ensure compliance with our legal obligations
Gender	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	For equal opportunity monitoring and reporting, and to ensure compliance with our legal obligations
Emergency contact information	Fulfil our legitimate interests (or those of a third party) Protection of your vital interests	To contact your next of kin in the event of an emergency
Government identification numbers [(e.g. national insurance, driving licence, passport)	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To verify your identity, and to comply with our legal obligations
Bank account details	Fulfil our legitimate interests (or those of a third party) Performance of the contract we have entered into with you	To pay your expenses
Employment records (including job titles and work history)	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure and evidence suitability for the role and for business management and planning
Education and training records	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure you have the correct qualifications and skills to perform the role

Professional membership records	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure you have the relevant memberships required or desirable in order to perform the role
References, CVs, cover letters and work history	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure and evidence your suitability for the role
Proof of work eligibility	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure you have the right to work in the UK
Location data (through building entry/exit records)	Fulfil our legitimate interests (or those of a third party) Protection of your vital interests	To ensure building security and health and safety
Health records	Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment. Necessary for the establishment, exercise or defence of legal claims. Necessary for the purposes of preventive or occupational medicine, and/or for the assessment of the working capacity of the employee. Fulfil our legitimate interests (or those of a third party) Compliance with our legal obligations	To provide appropriate adjustments to the recruitment process
CCTV footage	Fulfil our legitimate interests (or those of a third party)	To ensure building security
Criminal records checks	Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment	To ensure and evidence your suitability for the role

	Fulfil our legitimate interests (or those of a third party) Compliance with a legal obligation	
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Please note that, in the event of a dispute between us and you, any of the information set out above may be used to establish and defend a legal claim.

Schedule 2

Work experience

TYPE OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING	WHAT IT MAY BE USED FOR
Emergency contact information	Fulfil our legitimate interests (or those of a third party) Protection of your vital interests	To contact your next of kin in the event of an emergency
Government identification numbers [(e.g. national insurance, driving licence, passport)	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	To verify your identity, to administer payroll and benefits accurately, and to comply with our legal obligations
Bank account details, payroll information and tax status information	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	To pay you and ensure compliance with legal obligations
Performance and conduct information	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To monitor, assess and improve workplace performance and conduct and for business management and planning
Start date	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	To ensure your employment rights are honoured, to ensure you receive the correct benefits and to monitor your length of service
Professional membership records	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure you have the relevant memberships required or desirable in order to perform your role

Photograph	Fulfil our legitimate interests (or those of a third party)	To verify your identity
Location data (through building entry/exit records)	Fulfil our legitimate interests (or those of a third party) Protection of vital your interests	To ensure building security, and health and safety
IT records (including information about your use of our information and communication systems)	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure network and information security and, if necessary, to detect and prevent inappropriate usage
Telephone records	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure network and information security and, if necessary, to detect and prevent inappropriate usage
Race or ethnic origin	Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment Necessary for the establishment, exercise or defence of legal claims Fulfil our legitimate interests (or those of a third party) Compliance with our legal obligations	For equal opportunity monitoring and reporting, and to ensure compliance with our legal obligations
Health records	Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment. Necessary for the establishment, exercise or defence of legal claims. Necessary for the purposes of preventive or occupational medicine, and/or for the assessment of the working capacity of the employee. Fulfil our legitimate interests (or those of a third party)	To ensure employee safety in the workplace and to provide appropriate workplace adjustments

	Compliance with our legal obligations	
Attendance records	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To monitor attendance levels, to ensure employee safety in the workplace and to provide appropriate workplace adjustments
Sexual orientation	Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment. Necessary for the establishment, exercise or defence of legal claims Fulfil our legitimate interests (or those of a third party)	For equal opportunity monitoring and reporting, and to ensure compliance with our legal obligations
CCTV footage	Fulfil our legitimate interests (or those of a third party)	To ensure building security

Please note that, in the event of a dispute between us and you, any of the information set out above may be used to establish and defend a legal claim.