

Candidate Privacy Notice

Last updated on 9 October 2022

What is the purpose of this document?

Nomos International is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor) or you are being considered to be appointed as a director of Nomos Digital Ltd. This privacy notice will make you aware of how and why your personal data will be used, namely for the purposes of the candidate selection, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

In connection with our candidate selection process, we may collect, store, and use the following categories of personal information about you:

- Personal details including name, title, home address, telephone number, personal email address;
- The information you have provided to us in your curriculum vitae and covering letter or other application documentation, which may include your employment history, skills, education and training history;
- Previous salary/current salary and expected salary (if applicable);
- Interview notes and test results (if applicable); and



- Results of various checks we may need to carry out such as references checks, education checks, credit reference and basic criminal records checks.

We may also collect, store and use the following types of more sensitive personal information:

- Information about your health, including any medical condition or disability, which we should know about to help you during the selection process. Please note that we will only ask for and process this information to the extent it is relevant and necessary to make reasonable adjustments for you.
- Diversity information, which may include information about your race or national or ethnic origin, disability, religious or philosophical beliefs or your sexual orientation. Nomos will collect and process this information in connection with the candidate selection process only, to ensure the equality of opportunity or treatment. This type of processing is permitted under Schedule 1 Part 2 of the Data Protection Act 2018.
- As noted above, our candidates may be subject to credit reference checks and basic criminal records checks. See below for more details about the reasons why we may need to collect this type of information.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate;
- Recruitment agency;
- Any candidate verification agency we may appoint from time to time;
- Disclosure and Barring Service;
- Your named referees;
- LinkedIn or similar platforms that provide job/candidate search functionalities. Please note that we will only use such platforms if you have enabled the search function, i.e. made your profile available for viewing and searches by prospective employers; and
- Job boards (such as CV Library).

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role;
- Carry out background and reference checks;
- Communicate with you about the candidate selection process;
- Keep records related to our candidate selection processes; and



- Comply with legal or regulatory requirements.

Please see below for more information about how we will use sensitive personal information and information about criminal convictions.

It is in our legitimate interests to decide whether to appoint you to role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract with you to confirm your appointment.

Having received your application, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and carry out various checks (including a criminal record and credit check) before confirming your appointment. Please note that the above candidate selection process may differ depending on the role, for example in respect of our directors appointment process.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the candidate selection process, for example whether adjustments need to be made during a test or interview.
- We will use any diversity information provided by you to:
 - Ensure the equality of opportunity or treatment for our candidates; and
 - Identify or keep under review the existence or absence of equality of opportunity or treatment between groups of people with the view to enabling such equality to be promoted or maintained.



Information about criminal convictions

We may collect information about your criminal convictions history once we have offered you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. This is a requirement forming part of generally accepted principles of good practice in the financial services industry. In particular:

- All roles within Nomos International require a high degree of trust and integrity since they involve dealing with new-found technology, to be used by high-value clients and high-transactions. Consequently, we may need to ask you to seek a basic disclosure of your criminal records history. This enables us to prevent fraud, dishonesty, malpractice or other seriously improper conduct in connection with our activities, products and/or services.
- We normally require this for all our candidates because of the extremely sensitive nature of the work we do, and the way in which we organise our teams (agile ways of working, allowing people to perform various roles). We use a specialist recruitment verification agency to conduct these checks for us. In relation to the criminal records checks, we normally ask our candidates (through the candidate verification agency) to apply for basic Disclosure and Barring Service (DBS) checks and the results are supplied by DBS to the agency. The agency then present us with a summary report, but at this stage the report only informs us whether the DBS checks returned positive or negative. If the result is negative, we may decide to look into the results in more detail to ascertain whether the nature of the offence(s) is such that it could have an impact on our decision to recruit you. Please note that the criminal records checks process may vary depending on which candidate verification agency we use, or whether we use it at all. You will be informed about the process when you receive our request to carry out the checks.

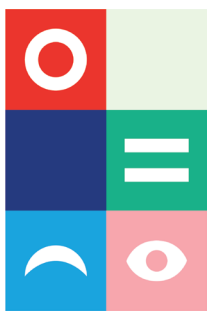
We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data security

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 limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data sharing

We will share your personal information with third parties only where required by law, where it is necessary in connection with the candidate selection process or where we have another legitimate interest in doing so.

"Third parties" includes third-party service providers (including contractors), professional advisers and other entities within our group. The following activities may be carried out by third-party service providers: candidate verification and background checks (if we use a candidate verification agency), candidate recruitment and liaison (if we use recruitment agency).

All 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.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to HMRC, disclosures to regulators and disclosures to shareholders such as directors' remuneration reporting requirements.

Some of our external third parties may be based outside the EEA in which case their processing of your personal data will involve a transfer of data outside the EEA.



Whenever we permit for a transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Data retention

How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you if you have been unsuccessful for a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If you are successful in your role, we will retain all data related to your recruitment process in line with our personnel privacy notice, which will be notified to you when you join us.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a period of 2 years on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, 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 and to check that we are lawfully processing it.



- 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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email data.protection@nomos.digital.

We do not rely on consents for the processing of personal data in connection with our recruitment process. However, if we do ask for your consent for a specific processing activity, you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please email data.protection@nomos.digital. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Data protection manager

We have appointed a Data Protection Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please email data.protection@nomos.digital. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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