

UK Candidate Privacy Notice

1 Overview

This Privacy Notice sets out how we collect, use and protect your personal data during our recruitment process. It applies to all candidates applying for roles at any of the UK based companies listed below which are part of the Encore Capital Group, which is based in the United States. Protecting your data is important to us and we are committed to complying with the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018.

2 Who are we?

This notice applies to the following UK entities. Where we use "Cabot", "we", "our" or "us" in this notice we mean Cabot Financial, Wescot Credit Services Ltd, Orbit Services Ltd, dlc and Mortimer Clarke Solicitors unless we say otherwise.

Company	Company Number	Registered Office
Cabot Financial (Europe) Ltd	03439445	1 Kings Hill Avenue, Kings Hill, West Malling, England, ME19 4UA
Cabot UK HoldCo Ltd	08467515	1 Kings Hill Avenue, Kings Hill, West Malling, England, ME19 4UA
Wescot Credit Services Ltd	SC084131	Kyleshill House, Glencairn Street, Saltcoats, Ayrshire, KA21 5JT
Orbit Credit Services Ltd	6476959	1 Kings Hill Avenue, Kings Hill, West Malling, England, ME19 4UA
dlc (Hillesden Securities)	1418063	1 Kings Hill Avenue, Kings Hill, West Malling, England, ME19 4UA
Mortimer Clarke Solicitors Ltd	6211733	16-22 Grafton Road, Worthing, West Sussex, England, BN11 1QP

If you have any questions about how we use or share your personal information please contact our Data Protection Officer (DPO), James McGrath, at dataprotection@cabotfinancial.com. For any enquiries relating to Mortimer Clarke Solicitors please contact compliance@mortimerclarke.co.uk.

The company you are applying to will be the data controller of your information which means it will be responsible for looking after your information.

3 What information do we collect about you?

We collect and process the following categories of personal data as part of the recruitment process:

3.1 *Identification and contact details*

- Full name, date of birth, gender, address (and recent previous addresses) telephone number, email address

3.2 *Application and employment data*

- CV/resume, cover letter, qualifications, work history, education
- Interview and assessment results
- Salary expectations, notice period, eligibility to work in the UK

3.3 *Pre-employment screening (PES) data (if applicable)*

- Identity verification (passport, driving licence)
- Proof of right to work
- Criminal record checks
- Credit reference and financial checks
- Sanctions, directorship and adverse media checks
- Reference details

3.4 *Special category data (only where necessary and where you are happy to provide)*

- Health or disability data for reasonable adjustments
- Diversity data (eg ethnicity, race, religion)

4 How we collect your data

We collect your data directly from:

- You (via applications forms, CVs, interviews)
- Recruitment agencies
- Online platforms (eg LinkedIn)
- Background screening providers (with your consent)
- Referees you provide

5 How do we use your personal data

The table below provides a detailed list of the purposes for which we will process your personal data, as well as our legal bases for doing so.

Purpose	Lawful Basis
<ul style="list-style-type: none">• recruitment and job applications• candidate screening (including in relation to sanction screening, politically exposed persons and specially designated nationals screening, references, work visas etc. (to the extent permitted by applicable law)).• equality and diversity monitoring (to the extent permitted by applicable law).	<ul style="list-style-type: none">• It is in our legitimate interests (for example, in order to ensure the effective functioning of our business, to carry out HR administrative functions or to protect our business• We are required to do this by law or regulation.• It is necessary in order to enter into your staff contract.• There is a Substantial Public Interest to conduct the processing (to the

	<p>extent permitted by applicable local law)</p> <ul style="list-style-type: none"> You have provided your explicit consent for your data to be processed
--	--

6 Automated Decision Making

We do **not** use automated decision-making or profiling to make hiring decisions. All decisions are reviewed and made by our recruitment or hiring teams.

7 Who we share your data with

We may share your personal data with:

- Other companies within the Encore Capital Group
- Background screening providers
- Recruitment agencies
- IT and system providers (eg recruitment platforms, data storage)
- Legal regulatory authorities (where required)
- Fraud prevention agencies (eg Cifas, for roles with financial responsibility)

All third parties are subject to appropriate data protection and confidentiality obligations.

8 International Transfers

As part of a global group, your data may be transferred to our parent company in the United States or other countries outside of the UK.

To ensure your data remains protected we rely on:

- UK-approved Standard Contractual Clauses (SCCs)
- Intra group data sharing agreements
- Additional safeguards where required

9 How long do we keep your data

We retain candidate data for:

- 12 months after the recruitment process ends (for unsuccessful candidates)
- CV and interview notes will be removed after 6 years for successful candidates
- If your application is progressed and you become an employee, your data will be held in line with our Employee Privacy Notice which will be provided to you as part of your onboarding pack.

10 Your rights

You have the following rights under UK data protection law:

- Access – to request a copy of your personal data
- Rectification – to correct incomplete or inaccurate data
- Erasure – to request deletion of your data (in certain circumstances)
- Restriction – to limit how we use your data
- Objection – to processing based on legitimate interests
- Portability – to request data you provided in a usable format
- Withdraw consent- where processing is based on your consent

To exercise any of these rights, please contact dataprotection@cabotfinancial.com.

If you are unhappy with how we handle your data, you also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO), www.ico.org.uk.

11 Changes to this notice

We may update this notice from time to time. The most recent version will always be available at [INSERT LINK]