

## LENDINVEST CANDIDATE PRIVACY POLICY

### INTRODUCTION

- This Candidate Privacy Policy explains what we do with your personal data from the point at which you apply to join the LendInvest team, until you either (i) become a member of our Staff (in which case you will become subject to our Staff Privacy Policy at that time), or (ii) you notify us that you do not wish to proceed further with your application, or we notify you that we do not wish to proceed further with your application. If you have access to view this Candidate Privacy Policy, then it likely applies to you.
- This Candidate Privacy Policy describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.
- For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "[GDPR](#)"), the company responsible for your personal data ("**LendInvest**" or "**us**") can be found [here](#).
- It is important to point out that this Candidate Privacy Policy is non-contractual and we may amend it from time to time. Please just visit this page if you want to stay up to date, as we will post any changes in our approach to data privacy here.
- If you are dissatisfied with any aspect of our Candidate Privacy Policy, you may have legal rights and so, where relevant, we have described these as well.

### WHAT KIND OF PERSONAL DATA DO WE COLLECT?

- We collect data about you to enable us to ensure that your application to join our [Staff](#) runs smoothly, and that we are each able to comply with duties to each other and to third parties such as tax authorities and government agencies.
- Depending on the relevant circumstances and applicable local laws and requirements, we may collect or receive some or all of the information listed below to help us with this, where appropriate:
  - name;
  - age/date of birth;
  - sex/gender;
  - photograph;
  - marital status;
  - CV;
  - contact details;
  - education details;
  - employment history;
  - emergency contacts and details of any dependants;
  - referee details;

- notice period under your current employment contract;
  - location of your current and previous employment or workplaces;
  - immigration status (including whether you need a work permit);
  - nationality/citizenship/place of birth;
  - a copy of your driving licence and/or passport/identity card;
  - social security number (or equivalent in your country) and any other tax-related information;
  - bank details;
  - shareholdings and directorships;
  - details about your remuneration, pension and benefits arrangements (including any benefit-specific information);
  - details of any prior criminal convictions, to the extent permissible by law;
  - information about your performance in your role at your current or previous employers,
  - extra information that you choose to tell us;
  - extra information that your current or previous colleagues choose to tell us about you;
  - extra information that your referees choose to tell us about you;
  - extra information that our clients, suppliers or other businesses choose to tell us about you, or that we obtain or receive from other third party sources;
  - any comments you post on social media, or candidate or client profiles;
  - financial information (including where we need to carry out financial background checks);
  - diversity information including racial or ethnic origin, religious or other beliefs, and physical or mental health, including disability-related information;
  - trade union membership, where applicable;
  - sexual orientation;
  - child care or carer arrangements; and
  - communications which pass through LendInvest's [Systems](#) or on/from [LendInvest's Devices](#), including emails, instant messages, social media posts, text messages and app-based messages (such as WhatsApp).
- Please note that the above lists of the ways in which we may collect or receive your personal details is not exhaustive.
  - A number of elements of the items listed above are required to enable us to fulfil our duties to you or to others. Some, for example your social security number (or equivalent), are required by statute or other laws in order for us to pay you appropriately, if and when you become a member of our [Staff](#). Other items may simply be needed to ensure that our [Relationship](#) can run smoothly if and when you become a member of our [Staff](#).
  - Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to

continue further with your application to join our [Staff](#). This would include, for example, details of your current and previous employment, and of your qualifications.

- For details of the legal bases that we rely on to be able to use and process your personal data, please click [here](#).

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## HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data in three primary ways:

1. Personal data that you give to us;
2. Personal data that we receive from other sources; and
3. Personal data we collect automatically.

Below are some more details about each of these methods.

### Personal data you give to us

- LendInvest needs to know certain information about you in order to make an informed decision in relation to whether or not you become a member of our Staff, to fulfil our obligations to you (and to ensure that you are properly fulfilling your obligations to us) if you do become a member of our Staff, and to ensure that we are both fulfilling our obligations to others.
- There are numerous ways that you can share your information with us. Where appropriate and in accordance with any local laws and requirements, these may include:
  - when you complete an application to join our [Staff](#) , whether by mail, email, or on an online platform such as [www.workable.com](http://www.workable.com); or
  - data you put on our [Systems](#), for example via documents you create and emails you send to us.

### Personal data we receive from other sources

- We also receive personal data about you from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:
  - information obtained about you when we search third party sources such as LinkedIn and other job sites for potential candidates for your role;
  - if you were referred to us through a recruitment agency, they may share or have shared personal information about you with us;
  - information obtained about you from third party service providers who undertake background checks about you on our behalf;
  - your referees may disclose or have disclosed personal information about you to us;
  - our clients and suppliers may share personal information about you with us;
  - your current or previous colleagues may share personal information about you with us;
  - medical professionals may (in appropriate and limited circumstances) share personal information about you with us;

- your pension and benefits providers may share relevant personal information about you with us;
- other third parties like your local tax authority may share your personal data with us; and
- we may obtain personal information about you from social media sites such as Facebook and Twitter, to the extent that you provide those data publicly.

#### Personal data we collect automatically

- Where appropriate and in accordance with any local laws and requirements, we may automatically collect personal data about you which pass through LendInvest's [Systems](#) or on/from [LendInvest's Devices](#), including emails, instant messages, social media posts, text messages and app-based messages (such as WhatsApp).

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#### HOW DO WE USE YOUR PERSONAL DATA?

We generally use [Candidate](#) data in five principal ways:

1. to assess whether we wish to hire you to join our [Staff](#), and to enable us to perform our obligations to you pursuant to our [Relationship](#) if you become a member of our [Staff](#);
2. to undertake equal opportunities monitoring;
3. to help us to establish, exercise or defend legal claims; and
4. to help us to help you and to understand our legal obligations if you suffer from a health condition or disability.

Below are some more details about each of these purposes.

#### To assess whether we wish to hire you to join our [Staff](#) and to enable us to perform our obligations to you pursuant to our [Relationship](#) if you become a member of our [Staff](#)

- We've listed below the principal ways in which we may process or use your personal data for this purpose, where appropriate and in accordance with any local laws and requirements:
  - collecting your data from you and other sources, such as your referees;
  - determining the terms on which you may work for us;
  - assessing your qualifications for a particular role;
  - making decisions about your employment or engagement;
  - verifying information we have received, using third party resources (such as psychometric evaluations or skills tests), or through information requests (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
  - storing your details (and updating them when necessary) on our databases;
  - facilitating our payroll and invoicing processes;
  - where applicable, liaising with your pension and benefits providers and ensuring that your benefits can be transferred and subsequently administered appropriately;

- complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties;
- keeping a record of any promotions, salary rises or bonuses you are awarded;
- conducting data analytics studies to review and better understand [Staff](#) retention and attrition rates;
- keeping a record of security pass data so that we can be sure who is on our premises at any given time; and
- running CCTV at our premises to ensure the safety and security of our [Staff](#) and property; and

#### To undertake equal opportunities monitoring

- We are committed to ensuring that our hiring processes are aligned with our approach to equal opportunities. Where the processing of such data is permissible in accordance with local law requirements, some of the data we may collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other beliefs, child care/carer arrangements and/or social-economic background. Where appropriate and only in accordance with any local laws and requirements, we'll use this information on an anonymised basis to monitor our compliance with equal opportunities requirements.

#### To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

#### To help us to help you and to understand our legal obligations if you suffer from a health condition or disability

- If you suffer from any health conditions or disabilities, we may, subject to local laws and requirements, record details of them so that we can make reasonable adjustments to your workplace and working arrangements if you do become a member of our [Staff](#), including phased return arrangements. Where appropriate and in accordance with any local laws and requirements, we may also liaise with medical professionals about your condition to ensure that you receive the support you need if you become a member of our [Staff](#).

Please note that the above list of the ways in which we use your personal data for this purpose is not exhaustive.

We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

To find out more about the legal bases that we rely on to be able to use and process your personal data in the above ways, please click [here](#).

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#### WHO DO WE SHARE YOUR PERSONAL DATA WITH?

- Where appropriate and in accordance with local laws and requirements, we may share certain of your personal data, in various ways and for various reasons, with the following categories of people:

- any of our group or associated companies;
- appropriate colleagues within LendInvest;
- professional advisers;
- individuals and organisations who hold information related to your reference or application to work with us, such as current or previous employers, educators and examining bodies, immigration agencies and employment and recruitment agencies;
- third parties, in order to comply with our legal obligations;
- third parties who hold information related to your financial record such as financial organisations, credit reference agencies and debt collection and tracing agencies;
- medical professionals such as your GP or an occupational health specialist;
- tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of our obligations to tax authorities or in connection with any anticipated litigation);
- third party service providers who perform functions on our behalf (including benefits administration, such as share plan administrators, insurers, private medical and dental providers, pension scheme administrators, external consultants, business associates and professional advisers such as lawyers, auditors, accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- third parties involved in, or assisting with, litigation (including legal advisers, witnesses, experts and judicial and quasi-judicial authorities);
- third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws; and
- if LendInvest merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

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## HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

- We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data. These include measures to deal with any suspected data breach.
- We are committed to taking all reasonable and appropriate steps to protect the personal data that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.
- If you suspect any misuse or loss of or unauthorised access to your personal data please let us know immediately. Details of how to contact us can be found [here](#).

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## HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- Subject to your rights (as explained in this Candidate Privacy Policy) we will ordinarily process your data throughout the course of your employment, if you join our [Staff](#). We will then retain it for a period after we have parted ways. If following your application you do not join our [Staff](#), we will nevertheless retain your data for a period of time following your application, for a number of the purposes described above.
- The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain your data for certain minimum periods. For example, we may be required to retain certain data for the purposes of monitoring our diversity and equal opportunities practices. We may also retain it if it might be relevant to any potential litigation.
- In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above).
- Once we have determined that we no longer need to hold your personal data, we will [Delete](#) it from our [Systems](#).

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## HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

One of the [GDPR's](#) main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regard to data privacy. Even if we already hold your personal data, you still have various rights in relation to it, which we have set out below.

To get in touch about these rights (including if you wish to exercise any of them), please [contact us](#). We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

The [GDPR](#) gives you the following rights in relation to your personal data:

### Right to object

- This right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) because it is within our [legitimate interests](#); (ii) to enable us to perform a task in the public interest or exercise official authority; and/or (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.
- The "legitimate interests" category above is the one most likely to apply in relation to you, and if your objection relates to us processing your personal data because we deem it necessary for our legitimate interests, we must act on your objection by ceasing the activity in question unless:
  - we can show that we have compelling legitimate grounds for processing which overrides your interests; or
  - we are processing your data for the establishment, exercise or defence of a legal claim.



### Right to withdraw consent

- Where we have obtained your consent to process your personal data for certain activities (for example, for automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to, unless we consider that there is an alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.

### Right to submit a data subject access request (DSAR)

- You may ask us to confirm what information we hold about you at any time, and request us to modify, update or [Delete](#) such information. We may ask you for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will tell you the reasons for doing so.

### Right to erasure

- You have the right to request that we "erase" your personal data in certain circumstances. Normally, the information must meet one of the following criteria:
  - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
  - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
  - the data has been processed unlawfully (i.e. in a manner which does not comply with the [GDPR](#));
  - it is necessary for the data to be erased in order for us to comply with our obligations as a data controller under EU or Member State law; or
  - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.
- We would only be entitled to refuse to comply with your request for erasure for one of the following reasons:
  - to exercise the right of freedom of expression and information;
  - to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
  - for public health reasons in the public interest;
  - for archival, research or statistical purposes; or
  - to exercise or defend a legal claim.
- When complying with a valid request for the erasure of data, we will take all reasonably practicable steps to [Delete](#) the relevant data.

### Right to restrict processing

- You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to



carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

- The circumstances in which you are entitled to request that we restrict the processing of your personal data are:
  - where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
  - where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
  - where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
  - where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.
- If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

#### Right to rectification

- You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you, including by means of providing a supplementary statement. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

#### Right of data portability

- If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer the details we hold on you to a third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data to a third party. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

#### Right to lodge a complaint with a supervisory authority

- You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact them can be found [here](#).

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found [here](#). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

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 period for which we hold your data.

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#### WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

- LendInvest Limited is responsible for processing your personal data.
- If you have any comments or suggestions concerning this Candidate Privacy Policy please follow this [link](#). We take privacy seriously so we'll get back to you as soon as possible.

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#### HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

- In order for us to continue operating in this way and to carry out the [purposes](#) described in this Candidate Privacy Policy, your data may be transferred to the following recipients located outside of your jurisdiction:
  - between and within LendInvest entities;
  - to third parties, as described above; and
  - to a cloud-based storage provider;
- We want to make sure that your data are stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:
  - by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws;
  - by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions;
  - where we are transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation;
  - where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer your data to a benefits provider based outside the EEA); or
  - where you have consented to the data transfer.
- To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

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## LEGAL BASES FOR US PROCESSING YOUR DATA

There are a number of different ways that we are lawfully able to process your personal data. We have set these out below.

### Where processing your personal data is within our legitimate interests

- Article 6(1)(f) of the [GDPR](#) states that we can process your data where it *"is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."*
- We consider the following to be non-exhaustive examples of processing activities that are in our legitimate interests to carry out so that we can build a successful workplace:
  - assessing your suitability for the role for which you have applied;
  - to prepare for you joining our [Staff](#), if we offer you a role at LendInvest Limited which you accept, including by setting up your information technology accounts here and setting up our payroll systems so that you are paid appropriately;
  - for our internal administrative purposes;
  - to prevent unauthorised use of our information and equipment; and
  - to assist us with establishing, exercising or defending legal claims.
- You can find further examples of ways in which we process your personal data for the purposes of our legitimate interests in the list [here](#).

### Where processing your personal data is necessary for us to carry out our legal obligations

- We also have legal obligations that we need to comply with. Article (6)(1)(c) of the [GDPR](#) states that we can process your personal data where this processing *"is necessary for compliance with a legal obligation to which [we] are subject"*.
- An example of a legal obligation that we need to comply with is our obligation to co-operate with tax authorities, including providing details of remuneration and tax paid. Other examples of our legal obligations can be found in the non-exhaustive list [here](#).

### Where processing your [Sensitive Personal Data](#) is necessary for us to exercise our rights or carry out our obligations pursuant to employment and social security law

- Sometimes it will be necessary for us to process your [Sensitive Personal Data](#). Article 9(2)(b) of the [GDPR](#) allows us to do this where the processing is *"necessary for the purposes of carrying out the obligations and exercising [our or your] specific rights... in the field of employment and social security and social protection law"*, as long as this is allowed by law.
- We process your [Sensitive Personal Data](#) for the purpose of ensuring our compliance with our [equal opportunities](#) obligations where this is in accordance with local law, but we may also process other elements of your [Sensitive Personal Data](#) for other reasons. You can find out how we process your [Sensitive Personal Data](#) in the non-exhaustive list [here](#).
- Where appropriate and in accordance with any local laws and requirements, we may also process your medical data to enable us to provide you with adequate support if you suffer from

a health condition or disability, for example by sharing medical information about you with an occupational health specialist. You can find out more about this [here](#).

- Please note that in the UK, additional rules apply to how we process your [Sensitive Personal Data](#). For more information in relation to any such additional requirements in your jurisdiction, please click [here](#).

#### **Where processing your personal data is necessary for us to establish, exercise or defend legal claims**

- Sometimes it may be necessary for us to process personal data and Sensitive Personal Data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".
- This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

#### **Where you give us your consent to process your personal data**

- In [very limited circumstances](#), we are required to obtain your opt-in consent before we can undertake certain processing activities with your personal data. Article 4(11) of the [GDPR](#) states that opt-in consent is "*any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.*" In plain language, this means that:
  - you have to give us your consent freely, without us putting you under any type of pressure;
  - you have to know what you are consenting to – so we'll make sure we give you enough information;
  - you should only be asked to consent to one processing activity at a time – we therefore avoid "bundling" consents together so that you don't know exactly what you're agreeing to; and
  - you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
- As and when we introduce these processing activities requiring your consent, we will provide you with more information so that you can decide whether you want to opt-in.
- You have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found [here](#).

We don't think that any of the above activities prejudice you in any way. However, you do have the right to object to us processing your personal data in certain circumstances. If you would like to know more about these circumstances and how to object to our processing activities, please click [here](#).

**ANNEX 1 – HOW TO CONTACT US**

<b>LendInvest entity</b>	<b>How you can get in touch with us:</b> <ul style="list-style-type: none"><li>• to access, amend or take back the personal data that you have given to us;</li><li>• if you suspect any misuse or loss of or unauthorised access to your personal information;</li><li>• to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data); and</li><li>• with any comments or suggestions concerning this Candidate Privacy Policy.</li></ul>
LendInvest Limited	<p>You can write to us at the following address:</p> <p>The General Counsel. LendInvest Limited 8 Mortimer Street London W1T 3JJ</p> <p>Alternatively, you can send an email to:</p> <p><a href="mailto:legal@lendinvest.com">legal@lendinvest.com</a></p>

**ANNEX 2 – HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY**

Country in which you are a member of LendInvest <a href="#">Staff</a>	Details of your local supervisory authority
UK	<p>The Information Commissioner's Office. You can contact them in the following ways:</p> <ul style="list-style-type: none"><li>• Phone: 0303 123 1113</li><li>• Email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a></li><li>• <a href="#">Live chat</a>.</li><li>• Post: Information Commissioner's Office</li></ul> <p>Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p>

**ANNEX 3 – COUNTRY-SPECIFIC VARIATIONS TO OUR CANDIDATE PRIVACY POLICY**

JURISDICTION	COUNTRY-SPECIFIC LEGAL REQUIREMENT
UK	Nothing in this Candidate Privacy Policy shall authorise LendInvest to collect and process your personal data in breach of the local data protection laws and regulations in this jurisdiction and the specific requirements set out by the local Data Protection Authority concerning the collection or processing of specific types of data, including sensitive personal data.
	Where your personal data are processed in accordance with the fair processing condition relating to our rights and obligations under employment and social security law, this relates to our processing of your personal data which is necessary for compliance with legal obligations.



**GLOSSARY**

- **Delete** – In this day and age it is virtually impossible to guarantee the permanent and irretrievable deletion of electronic data. In addition, as we have explained to you in this Candidate Privacy Policy, sometimes we may be obliged by law or regulation, or need for risk-management reasons, to retain the ability to access certain elements of personal data. However, our commitment to you is that once your personal data reaches the end of its nominal retention period, or where we receive a valid request from you to erase it, we will put in place specific operational and [Systems](#) measures to ensure that your data is "put beyond use". By this we mean that while the data will still technically exist on an archive system, we will ensure that it cannot be accessed by any of our operational [Systems](#), processes or [Staff](#). Only a very (and we mean exceptionally) small number of senior [Staff](#), in very (and, again, we mean exceptionally) limited and carefully prescribed situations, be able to restore your personal data so that it can be viewed for those legitimate purposes. Once we are clear that all relevant legally mandated retention periods have expired (which, for present purposes, we expect to be the period of seven years) we will go the additional final step of undertaking a "hard delete", whereby not even that very limited number of senior [Staff](#) would be able to restore your personal data.
- **General Data Protection Regulation (the "GDPR")** – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed to include any national legislation implementing it.
- **LendInvest's Devices** – includes landline phones at LendInvest's offices, mobile phones, BlackBerry devices, SIM cards, desktop computers, tablets, laptops, cameras provided to [Staff](#) by LendInvest and any other such devices used by our [Staff](#).
- **Relationship** – means a contractual relationship between LendInvest Limited and its [Staff](#).
- **Sensitive Personal Data** – this is personal data consisting of information such as your racial or ethnic origin, your political opinions or religious beliefs, whether you are a trade union member, your physical and mental health, your genetic and biometric data, data relating to your sex life and sexual orientation, and whether you have or are alleged to have committed a criminal offence. Due to the nature of sensitive personal data, data protection legislation is much stricter about how such data should be held and processed. We will only process your sensitive personal data where appropriate and in accordance with local law requirements.
- **Staff** – includes employees and interns engaged (or who have accepted an offer to be engaged) directly in the business of LendInvest as well as certain other workers engaged in the business of providing services to LendInvest (even though they are not classed as employees). For illustrative purposes, it is generally the case that if an individual is granted access to the Backyard, they will be covered by the terms of our Staff Privacy Policy. Likewise, our Staff Privacy Policy does not apply to independent contractors or consultants performing services for LendInvest, both of which be considered a 'supplier' for the purposes of the LendInvest General Privacy Policy.
- **Systems** – include telephone, computer, internet and Wi-Fi systems, software and portals, accounts and/or networks belonging, controlled or used by LendInvest that are used to transmit, undertake and/or receive communications or are otherwise used in the course of LendInvest's business.