

At Cobalt Consulting (UK) Ltd, we take your privacy seriously and will only use your personal information for the purposes of administering your application to work directly for us and any subsequent employment. This privacy notice is intended for applicants to work directly for Cobalt Consulting (UK) Ltd and who are residents in the UK or EU.

If this does not apply to you, please refer to one of the other Privacy Notices provided as part of our Privacy Policy.

Under the GDPR (General Data Protection Regulation), we are required to provide detailed information regarding the processing of personal data, at the point of data collection.

References to **we, our** or **us** in this privacy notice are to the **Cobalt Consulting Group** (being **Cobalt Consulting Holdings Limited**), and each of its direct and indirect subsidiaries, trading under the "**Cobalt**" brand. Details of the main trading entities are as follows:

- **Cobalt Consulting (UK) Limited** is a limited company incorporated in England and Wales. Registered Number: 04287243. Registered Office: 7 - 10 Chandos Street,  
London, W1G 9DQ

- **Cobalt Deutschland GmbH** is a limited company incorporated in Germany.

Registered Number: HRB 133362 B. Registered Office: Uhlandstrasse 187,10623

Berlin, Germany.

- **Cobalt Consulting, Inc.** is a Corporation registered in Delaware, US. DOS ID:

5687313. Office: 21 W. 46th Street, Suite 805, New York,10036, USA

- **Comanos Consulting Ltd** is a limited company incorporated in England and Wales. Registered Number: 15323378. Registered Office: 7-10 Chandos Street, London, W1G 9DQ
- **Comanos GmbH** is a limited company incorporated in Germany. Registered Number: HRH 37452 P Registered Office: Dortustraße 40, 14467 Potsdam

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Manager – Jonathan Page - has overall responsibility for data protection compliance in our organisation.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your employment with us.

For the purposes of data protection, the company in our Group which is processing your personal information will be the controller of any of your personal information, in this case, Cobalt Consulting (UK) Ltd. Your personal data may also be shared between the Group's offices and associated entities as necessary or appropriate.

## 1. PERSONAL INFORMATION

The data contained on our systems will be processed for Cobalt's internal recruitment and your potential employment purposes only. We are committed to being transparent about how we collect and use this data and to meeting our data protection obligations.

We will only collect, store and process information about you that is relevant to the recruitment process and your potential employment with us. You may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details such as name, addresses, telephone numbers and personal email addresses
- date of birth;
- gender;
- identification documents such as passport/driving licence details (including copies where we are required to hold such information for identification purposes);
- employment history and location of current workplace;
- Contracts of Employment (which includes such information as your pay and benefits);

- records of your interactions with us such as, emails and other correspondence and your instructions to us;
- recruitment records including references and other information included in a CV, cover letter or as part of the application process) and activities (including information about interviews, jobs applications and offers with us);
- referee details, next of kin, beneficiaries, details of family members and emergency contacts;
- information about endorsements on Driving Licences;
- national insurance number and other tax or governmental identifiers;
- information relating to family leave and sabbaticals;
- psychometric assessments or other profiling results undertaken at interview stage; and
- information about your gender, age, sex, ethnic origin and disability.

## **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may collect the following “**special categories**” of more sensitive personal information about you during the course of your employment:

- information about your health and sickness records;

- information about your criminal record;
- results of drug and alcohol tests; or
- occupational health and medical advice.

We generally do not collect the following “**special categories**” of more sensitive personal information:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships; or
- biometric information about you, for example, fingerprints, retina scans.

In relation to the special category personal data that we do process, we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment, social security, social protection law or health and safety legislation; or

- based on your explicit consent.

### **3. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about you when you apply to us either directly or through a third party with a CV, during the interview process, when you complete information on our HR system on commencing employment with us, return your employment contract, update your details with our Backbone team or when you correspond with us by phone, email or otherwise. In some cases, we may collect personal data about you from third parties, such as references, employment background checks and information about criminal records.

During the interview process, you may be asked to complete a personality or psychometric assessment. You will be provided with more information about the process at the point of sitting the assessment, but your consent is explicitly required to undertake the assessment.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you

feel are sufficiently mature to understand it. They also have the same rights as set out in the **“Your rights in relation to personal information”** section below.

#### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this. Where we rely on legitimate interests as a reason for processing data, we have considered whether or not these interests are overridden by the rights and freedoms of Applicants, Employees or Workers and have concluded that they are not.

| <i>Purpose</i>   | <i>Personal information used</i> | <i>Lawful basis</i>            |
|--|----------------------------------|--------------------------------|
| <b>Non- ‘special categories’ of Personal Information</b>           |                                  |                                |
| <b>To assess your CV and qualifications</b> <i>(where you have</i> | All your personal information    | We need this information to be |

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| <p><i>provided us with/we have collected your personal information directly from you)</i></p>              | <p>excluding 'special categories' of personal information and criminal records information</p>  | <p>able to perform and administer the initial recruitment process for you and it is in our legitimate business interest to ensure you are suitable for a role.</p> |
| <p><b>To manage our relationship with you including dealing with any support enquiries made by you</b></p> | <p>All your personal information excluding 'special categories' of personal information and</p> | <p>To be able to manage and perform our contract with you.</p>   |



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|  | <p>criminal records</p> <p>information</p>   |  |
| <p><b>To check you are legally entitled to work in the UK</b></p>  | <p>Personal contact details and identification documents and right to work documentation</p> | <p>We may have a legal obligation to do so and it is also in our legitimate business interest to ensure that you are able to undertake a role.</p> |
| <p><b>Storage of records relating to you and also records relating to our business such as your recruitment records and records of your interactions with us</b></p> | <p>All non-‘special categories’ of personal information</p>                                  | <p>To be able to manage and fulfil our contract with you, we may have a legal obligation</p>   |

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|  |  | <p>to do so and we</p> <p>also have a</p> <p>legitimate business</p> <p>interest to keep</p> <p>proper records.</p> |
| <p><b>Dealing with legal disputes involving you</b></p>    | <p>All your personal information excluding 'special categories' of personal information and criminal records information</p> | <p>We have a legitimate interest to ensure that all legal claims are managed effectively.</p>                       |
| <p><b>Complying with health and safety obligations</b></p> | <p>Personal identifiers e.g. when you sign it</p>  | <p>We have a legal obligation to comply with</p>  |

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|   | at one of our offices   | Health and Safety laws.   |
| <b>For the purpose of complying with any legal or regulatory requirements</b> | All the personal information about you excluding special category information and criminal records data | We may have a legal obligation to comply with certain requirements and we have a legitimate interest in complying with any regulatory requirements. |
| <b>For the purpose of executing a contract we may have with you</b>           | All the personal information about you excluding special  | We may have obligations under a contract with you and require this  |

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|  | <p>category</p> <p>information and</p> <p>criminal records</p> <p>data</p>   | <p>information in</p> <p>order to execute</p> <p>that contract E.g</p> <p>making payment</p> <p>to you.</p>  |
| <p><b>‘Special categories’ of Personal Information or criminal records</b></p>             |  |  |
| <p><b>Storage of records relating to you and also records relating to our business</b></p> | <p>All ‘special</p> <p>categories’ of</p> <p>personal</p> <p>information</p> | <p>We process special</p> <p>category personal</p> <p>data on the basis</p> <p>of the “special</p> <p>category reasons</p> <p>for processing of</p> <p>your personal</p> <p>data” referred to in</p> <p>section 2 above.</p> |

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| <p><b>We will use and retain information about criminal convictions to comply with law and in order to determine your eligibility to undertake particular types of work</b></p> | <p>Information about your criminal convictions and offences</p> | <p>For criminal records information we process it on the basis of legal obligations or based on your explicit consent.</p>                      |
| <p><b>For the purpose of the initial recruitment process and induction of you</b></p>   | <p>Results of personality or psychometric profiling</p>         | <p>We use this information to inform our questions at interview stage and may use the results to ensure the best induction process for you.</p> |

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| <p><b>For drug and alcohol testing</b></p>                    | <p>Information about your health, including any medical condition, health and sickness records, medical records and health professional information</p> | <p>Special categories of personal data shall be processed on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> |
| <p><b>To prevent and detect criminal or improper acts</b></p> | <p>Information about your criminal convictions and offences</p>   | <p>Criminal records information will be processed on the basis of legal obligations or</p>  |

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|  |   | <p>based on your explicit consent.</p>  |
| <p><b>To use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments and to monitor and manage sickness absence</b></p> | <p>Information about your health, including any medical condition, health and sickness records, medical records and health professional information</p> | <p>Special categories of personal data shall be processed on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> |

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| <p><b>To 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</b></p> | <p>Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions</p> | <p>Special categories of personal data shall be processed on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> |
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For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to engage you, or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your engagement. For other personal information, whilst you may not be under an obligation to provide it to



us, if you do not provide it then we may not be able to properly perform our contract with you.

Where psychometric assessments or other profiling techniques are used, this is only to provide further information to us for the interview and induction process; a human is always involved in the decision-making process on whether to offer you a role, or which role to offer you. You can refuse to sit any assessment of this type. By its very nature, consent is required from you before undertaking the assessment. More information will be provided to you at the point of sitting the assessment.

You should be aware that you are not required under any contract with us to agree to any request for consent. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Companies in the same group of companies as us:** for the purpose of providing a service to you and as part of its regular reporting activities on Group performance, for system maintenance support, hosting of data, and for the purposes of data mapping and analysis of different recruitment markets;
- **Any party approved by you;**
- **Other service providers to our business and advisors:** for example: payroll, HR and other external professional advisors, contractors, administration and IT services (including CRM and website service providers). All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information and do so on the basis of written instruction, with a duty of confidentiality;
- **Internally:** data may be shared internally, including with payroll, recruiting Managers, HR and the office management team (if access to the data is necessary for performance of their roles);

- **Purchasers of our business:** buyers or perspective buyers to whom we sell or negotiate to sell our business;
- **The Government or our regulators:** where we are required to do so by law or to Commissioner's Office; and
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above. The data held on you will be retained by the Finance Team who will store this on our systems. Where personal data is held on our HR system you are notified who has access to it. For information on how long we store your information for, please see section 8 below.

We have controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed to someone who does not have authority to see it, and is not accessed except by our employees in the performance of their duties.

## **6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

Due to the international reach of our Group, each member of the Group will actively share personal data with other members of the Group as part of its regular reporting

activities on Group performance, for system maintenance support, hosting of data, and for the purposes of data mapping and analysis of different recruitment markets.

Therefore, the personal data we collect shall be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "**Contacting us**" section below.

Our directors and other individuals working for us may also in limited circumstances access personal information outside of the UK and European Union if they are working overseas or on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section “**Disclosure of your personal information**” above may be located outside of the UK and European Union. In these cases, we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above, then please contact us using the details in the “**Contacting us**” section below.

## **7. HOW LONG WE KEEP PERSONAL INFORMATION FOR**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. Should you become an employee of ours, your personal information will be retained for the duration of your employment and could be retained for a period of up to 6 years thereafter, where we need to retain it for legal purposes in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us.

Should you not become an employee of ours, then your data will be kept on file for future opportunities for up to 2 years, unless you request that we delete it in accordance with section 9 below.

## **8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used;
- The right to access the personal information we hold about you;
- The right to request the correction of inaccurate personal information we hold about you;
- The right to request the erasure of your personal information in certain limited circumstances;
- The right to restrict processing of your personal information where certain requirements are met;
- The right to object to the processing of your personal information;
- The right to request that we transfer elements of your data either to you or another service provider; and

- The right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example, the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use purely automated decision-making in relation to your personal data. However, some have no conditions attached.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection

regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## **9. CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice, we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## **10. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please contact Jonathan Page, Group Finance Director, acting as Data Compliance Manager for this purpose:

Email: [jpage@cobaltrecruitment.com](mailto:jpage@cobaltrecruitment.com)

Tel: 0207 478 2500



Post:7 - 10 Chandos Street,

London, W1G 9DQ.

For Subject Access Requests, changes in your personal information or to withdraw your consent, please contact ~~310~~ Jonathan Page, Group Finance Director, as above.

**Version: 21<sup>st</sup> June 2024**