

PRIVACY POLICY FOR EMPLOYEES OR PROSPECTIVE EMPLOYEES

In order to work for or to apply for an employment role with Step One Finance Limited, you will need to provide us with your personal information. This document sets out when and why we collect your personal data, the conditions under which we may disclose it to others and how we keep it secure.

We may change this document from time to time. By providing your information to us, you agree to be bound by this document.

Any questions regarding this document and our privacy practices can be obtained by contacting the Head of Risk or the Head of Compliance or by writing to us at Step One Finance Limited, Premier House, 15-19 Church Street West, Woking, Surrey, GU21 6DJ.

1. Who are we?

Step One Finance Limited (“Step One Finance/we/us/our”) of Premier House, 15-19 Church Street West, Woking, Surrey, GU21 6DJ is a specialist consumer lending business, authorised and regulated by the Financial Conduct Authority (706087). We are members of the Finance & Leasing Association.

2. How do we collect information about you?

We may be passed your personal information via an Employment Agency, referral from an existing/former employee, from an internet job search website, or by you applying to us directly by submitting your Curriculum Vitae and/or completion of our Application Form. We will also obtain information about you by making enquiries with Credit Reference Agencies (CRAs) and Fraud Prevention Agencies (FPAs) and obtaining references from former employers/educational establishments.

3. What happens if you do not supply your personal information to us?

If you do not provide this information, we will not be able to consider you for an employment role.

4. What type of information is collected from you and why?

We request your personal information such as your name (including any maiden or previous name), address, contact details such as email address and phone numbers, date of birth, former employment details, education details and copies of documents (such as passport, driving licence), National Insurance number, nationality and bank details. This information will be used by us as set out below:

4.1 Process your application for employment

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and other relevant conduct and to verify your identity. It will be used to process your application for employment which might result in a contract and to ensure you are suitable to join a regulated financial services business. We will also need to:

Verify your home address by reviewing documentation provided by you and/or checking with CRAs.

Obtain a reference for you for up to 6 years of previous employment/educational history

We will check your details against the Cifas databases established for the purposes of allowing organisations to record and share data on their fraud cases, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct (“Relevant Conduct”) carried out by their staff and potential staff. “Staff” means any individual engaged as an employee, director, trainee, homeworker, consultant, contractor, temporary or agency worker, or self-employed individual, whether full or part time or for a fixed-term.

In order to process your application and before we provide employment to you, we will perform credit, fraud and money laundering prevention and identity checks on you with one or more Credit Reference Agencies (“CRAs”) and (“Cifas”). These checks require us to process personal data about you. If you take employment with us, we may also make periodic searches at CRAs and Cifas to manage your employment with us.

To do this, we will supply your personal information to CRAs and Cifas and they will give us information about you. This will include information about your credit and financial history. CRAs will supply to us both public (including electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your ability to maintain your finances.
- Verify the accuracy of the data you have provided to us.
- Prevent criminal activity, fraud and money-laundering.

If these checks are successful, we may then offer you a contract of employment and if accepted, will retain the information collected about you and may need to collect further personal information from you to support your employment (e.g. Details of an emergency contact in the event of an accident or sickness).

4.2 Employment

Once employed, your information will be used:

- To perform annual review checks of your financial standing/conduct of your financial affairs.
- To prevent money laundering and fraud.
- To enrol you into our pensions scheme (if you do not want to opt out) via our external data processor.
- To process payroll via our external data processor.
- To keep a record of training required/provided/undertaken and to ensure your fitness and competency to perform your employment role.
- To process details about your employment history with us.
- To keep a record of your performance, absences including holiday/sickness.

4.3 Sensitive Personal Data

During the course of your employment, you may need to supply us with, or we may become aware of, sensitive personal information relating to your health/circumstances. This information will be kept confidential and will be held on file in order that we can provide assistance to you.

5. Consequences of Processing

We process your personal data on the basis that we have a legitimate interest in preventing fraud and other Relevant Conduct, and to verify identity, in order to protect our business and customers and to comply with laws that apply to us. The processing of your personal data is also a requirement of your engagement with us and a contractual requirement of your employment to which you would be a party. It may also be necessary during the term of any contract made to process your data in order to protect your vital interests if it is believed that you are physically or legally incapable of giving consent.

We and Cifas may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share information, data retention periods and your data protection rights with the CRAs are

explained in more detail in CRAIN. CRAIN is accessible from each of the three CRAS – clicking on any of these three links will also take you to the same CRAIN document.

Callcredit – www.callcredit.co.uk/crain

Equifax – www.equifax.co.uk/crain

Experian – www.experian.co.uk/CRAIN

Should our investigations identify fraud or any other Relevant Conduct by you when applying for or during the course of your engagement with us, your new engagement may be refused or your existing engagement may be terminated or other disciplinary action taken (subject to your rights under your existing contract and under employment law generally).

A record of any fraudulent or other Relevant Conduct by you will be retained by Cifas, and may result in others refusing to employ you. If you have any questions about this, please contact us on the details provided.

6. Who do we share your information with and why we do it?

Any information received from you for the purposes of employment will be held securely, only accessed by relevant Senior Management, your line Manager where applicable or contracted third parties who assist us with duties relating to your employment. We may also share your information for the purposes of enforcing the law or to meet our regulatory requirements.

By supplying your information you understand that it will be used as above.

7. Data Transfers

Step One may transfer your personal data outside of the European Economic Area, we will take steps to protect your personal data to the standards required in the European Economic Area.

A record of any fraudulent or other Relevant Conduct by you will be retained by Cifas, and may result in others refusing to employ you. If you have any questions about this, please contact us on the details provided.

Should Cifas decide to transfer your personal data outside of the European Economic Area, they will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

8. Retention of Information

Step One Finance Limited, we will need to keep your personal data records including any responses received from CRAs/FPAs/References/Criminal records checks for the following periods:

Successful Employment – 6 years from the end of your employment

Unsuccessful Applications following interview – 12 months

Unsuccessful Applications (no interview) – 3 months

Cifas will hold your personal data for up to six years if you are considered to pose a fraud or Relevant Conduct risk.

9. Your Rights

Your personal data is protected by legal rights:

9.1 Right to object to our processing of your personal data;

If we rely on your consent for the processing of any of your personal data, you have the right to request that we stop processing it. (e.g. marketing purposes). However, the majority of the personal data is collected as set out above and you would not be able to object to us processing it for these purposes.

9.2 Right to request that your personal data is erased or corrected

If you believe that some personal information we hold about you is incorrect, you have the right to ask for it to be corrected and in certain circumstances erased.

9.3 Right to request access to your personal data.

You have a right to request a copy of the personal data we hold about you. Please contact us to make your request. Upon receipt of your request, we have 30 days to send the information to you.

9.4 Right to restrict us from processing your personal data

This right may apply if you have requested us to correct some of your personal data and we are verifying the accuracy of the data to be corrected or you have objected to the use of your personal data and we are considering whether our legitimate interests override your objection. You may also ask us not to erase your data but to restrict its use, if we no longer need it but you want us to keep your information to establish, exercise or defend a legal claim.

9.5 Right of Data Portability

You have the right to request that we transmit the personal data you have given us, where the processing of such data is carried out by automated means, to you or to another organisation. In this event, we will provide the information in a machine readable format so that another organisation's software can understand that information. We will provide this information to you within 30 days of request.

9.6 Right to a manual review of an automated decision.

If the decision has had a legal or similarly significant effect on you. Please note that any automated decision making we carry out is done for the performance of a contract between you and us so this right may not apply in certain circumstances.

For more information or to exercise your data protection rights please, contact us using the contact details provided. You also have the right to complain to the Information Commissioner's Office which regulates the processing of personal data.

ICO - <https://ico.org.uk/>

Telephone Number -0303 1231113

ICO textphone 01625 545860

I confirm I have received a copy of the SOFL Employee Privacy Policy

Signed _____ Date: _____

Full Name _____