

Recruitment Privacy Policy

Purpose:

Stride Gaming plc and its subsidiaries ('the Company') are committed to respecting and protecting your privacy and the confidentiality of any information that you provide us with. The purpose of this statement is to set out how and why we collect, store, use and share any personal information that we may obtain from you and to detail your rights in relation to it. The Company is regulated by the General Data Protection Regulations and are responsible as a controller for the purposes of those Regulations.

Policy:

Use and collection of personal information

As part of any recruitment process, the Company collects and processes a range of information about you. This may include:

- Information by which you can be personally identified, such as your name, address, contact details including but not limited to email addresses and telephone numbers, details of your qualifications, skills, experience and employment history.
- Information about your current level of remuneration, including benefit entitlements, whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process and information about your entitlement to work in the UK.
- Information which does not identify you such as technical information which may be provided to us automatically as you navigate through the website (e.g. usage details, location-based information) and from third parties, for example our business partners.

The Company may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

The Company may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in our HR management systems and on other IT systems (including email).

Your knowledge and consent of our collection, use and disclosure of your personal information is critical in order to provide services to you. We rely on any of the following actions by you as indications of your consent: your voluntary provision of personal information directly to us; your express consent or acknowledgment contained within our terms of business; your acceptance of this privacy statement which will be notified to you, until such time as you notify us in writing of withdrawal of this consent.

Where direct consent is not required from you, we may process your personal information if it is necessary for the performance of a contract or to enter into a contractual relationship with you or if it is necessary for genuine and legitimate business interests.

Why do we process your personal data?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

The Company may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. The Company processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, the Company may keep your personal data on file in case there are future employment opportunities for which you may be suited. The Company will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

Who has access to your personal data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the People & Performance team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Your information will also be shared externally with prospective employers or recruiters if you respond to a job advertisement and in order to manage job postings.

The Company will not share your data with any other third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and, where applicable to Disclosure and Barring Service to obtain necessary criminal records checks.

How does the Company protect data?

The Company takes the security of your data seriously. The Company has internal technical and organisational measures in place to protect any personal information we process about you to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees or contractors in the performance of their duties. All information you provide to us is stored on our secure servers behind firewalls.

Unfortunately, no data transmission over the internet is guaranteed to be 100% secure and as a result you acknowledge that there are security and privacy limitations of the internet which are beyond our control. The safety and security of your information is also dependant on you. Where we have given you (or where you have chosen) a password for access to documents, you are responsible for keeping this password confidential. We ask you not to share passwords with anyone and keep your account information secure. In the event that personal data is compromised as a result of breach of security, we will notify those persons in accordance with the notification procedure set forth in this privacy statement or as otherwise required by applicable law.

Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical organisational measures to ensure the security of data.

How long does the Company keep data?

If your application for employment is unsuccessful, the Company will hold your data on file for 6 months' after the end of the relevant recruitment process. If you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further year for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice and/or policy.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- withdraw your consent or require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing and
- object at any time to the processing of personal information concerning you for direct marketing

If you would like to exercise any of these rights, please contact jobs@stridegaming.com and let us know the information to which you request relates.

We hope we can resolve any query or concern you raise about our use of your information. If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.

Payment of a fee will not be charged for any request for access to your data unless the request is manifestly excessive or unfounded under the General Data Protection Regulations.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, certain information, such as names, address and contact details must be provided to enable the Company to provide this service to you. If you do not provide certain information, this may hinder the Company's ability to process your application properly or at all.

Automated decision-making

The Company's decisions are not based solely or partially on automated decision-making.

Notices and Revisions

If you have any concern about your privacy or this privacy statement, please e-mail a thorough description and we will try to resolve the issue for you. Our business changes constantly and our Privacy Statement Terms & Conditions may change too. Any changes, modifications, additions or deletions shall be effectively immediately upon notice, which shall be given by means including but not limited to, issuing an email to the email address listed and/or posting a notice and the revised policy on the website. You acknowledge that it is your responsibility to maintain a valid email address as a registered user, and to review the site and privacy statement periodically in order to be aware of any modifications. Your continued use of the services after such modification will constitute your acknowledgment of the modified statement and agreement to be bound by it.

Maintenance & Dissemination:

Responsibilities:

People & Performance

Review:

Annually

Revision History

Version	Date	Change Detail	Changed	Authorized
1.0	24/05/2018	Creation		JOC
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