

UK Privacy Notice (Recruitment)

AUK are committed to complying with data protection laws.

This Privacy Notice describes how AUK collect, use, share and secure your personal data when you are applying for employment with AUK.

This Privacy Notice sets out –

- why AUK may collect personal data about you?
- what types of data AUK may collect?
- how AUK collect your personal data?
- what is the legal basis for collecting and processing your personal data?
- for how long will the personal data be retained?
- who does AUK share your personal data with?
- how does AUK protect your personal data?
- automated decision making;
- what rights do you have over your personal data;
- how do I ask a question or make a complaint?
- international transfers;
- data subject access requests; and
- how and when this Privacy Notice will be updated.

For the purposes of the data protection legislation, the company responsible for your personal data (i.e. the Data Controller) is Aspen Insurance UK Services Ltd.

Why AUK may collect personal data about you?

AUK collect and process your personal data in compliance with all relevant data protection laws including the UK General Data Protection Regulation (UKGDPR), the Data Protection Act 2018 (DPA) as well as other applicable legislation. Personal data, or personal information, is any information about you from which you can be identified. For example your name, your date of birth, your contact details and your email address.

AUK may collect personal data for the following reasons –

- to consider your application for employment;
- to conduct background checks for legal and regulatory purposes;
- to deal with any issues that may arise from your application;

- to communicate with you and to carry out administration in connection with your application.

What types of data may AUK collect?

The types of personal data that we may collect and use include –

- personal details including name, age, date of birth and marital status;
- contact information including address, telephone numbers and email address;
- National insurance number;
- business title and grade or level;
- employment history;
- education history;
- financial information relating to your salary and taxation (such as credit history, reward and overall current and requested salary package);
- aptitude testing of cognitive abilities through psychometric testing; and
- survey information related to experience of the recruitment process.

The types of special categories of personal data that AUK may collect, and use include –

- nationality (including visa status, the need for sponsorship, current right to work in the UK and full identity verification);
- ethnicity (language details, education institutions, background information and Equal Opportunities data);
- gender;
- pictures including copies of your ID;
- CCTV footage if you enter our premises for an interview;
- employment references;
- certifications
- background checks including checks carried out via a third-party specialist providers. That might include evidence of right to work in the UK, proof of current address, criminal records, current and previous employment (including directorships and similar positions listed on Companies House), academic verification, international sanctions and credit history;
- health data (obtained only at offer stage and through our Occupational Health provider, who will act as a separate data controller for that purpose);

- health and safety related information, where relevant; and
- information on your family members.

When providing us with the data, you represent that such data is accurate, complete, up to date, and is supplied for the sole purpose of seeking job or employment vacancies or positions.

Aspen is an equal opportunities employer and does not in any way discriminate against any individual who provides information in line with equal opportunity categories should you choose to provide this. Information provided is only used for reporting on the diversity of our candidate base across Aspen.

Your personal data will be used to assess and administer your application for employment at Aspen. This may involve –

- contacting you as a potential candidate;
- conducting interviews;
- assessing the suitability of you as a candidate;
- conducting background checks on you;
- preparing your employment contract for signature;
- internal procedures to ‘onboard’ you;
- monitoring and reviewing Aspen’s resourcing practices

How does AUK collect your personal data?

Most of the personal data that Aspen holds about you is provided by you. In addition, we may collect data from –

- official authorities and publicly available data sources (for identity verification, financial, immigration, directorship and criminal history);
- your previous employers;
- your educational institutions you attended;
- tax authorities;
- credit reference agencies;
- third party providers specialising in background screening;
- recruitment agencies;
- surveys; and

- we also use cookies to follow the application process and to improve the use of our website

What is the legal basis for collecting and processing your personal data?

AUK processes your personal information in compliance with all relevant data protection laws including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA), the applicable provisions affecting or ensuring data privacy within the Insurance Act 2015, as well as all other applicable laws. The UK GDPR requires us to have a legal basis for processing your personal information. In most cases the legal basis will be one of the following –

Activity	Legal Basis
Candidate responds to job advert with CV	Legitimate Interest
Criminal checks	Entering a contract/Legal Obligation
Credit Check	Entering a contract/Legal Obligation
Right to work in the UK checks	Entering a contract/Legal Obligation
Medical Checks	Entering a contract/Legal Obligation
Employment References	Entering a contract
Qualifications History	Entering a contract
Offer of Employment	Entering a contract/Legal obligation
Retain CV for future job opportunities	Consent

For how long will my personal data be retained?

We will only keep your personal data for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and to comply with our legal and regulatory obligations. If you are not employed by AUK, unless you have consented for us to hold your CV for longer to be considered for other roles, we will retain application records for 6 months.

Who does AUK share your personal data with?

AUK does not sell any data to third parties for commercial purposes.

AUK may share your personal data with other Aspen Group companies in order to administer your application and, if you accept employment with AUK, to administer your employment.

If you agree for your CV to be retained for possible future vacancies, we may share your data within other Aspen Group companies.

In some cases, AUK may use third party suppliers to assist with the recruitment process. The third party may operate in countries outside the EEA, such as India or the United States. In these instances, we ensure those parties have appropriate arrangements in place to allow for international transfer.

All disclosures are made following the applicable laws and regulations, and the necessity to disclose data.

AUK may also disclose your personal data to the third parties listed below for the purposes described in this Privacy Policy. This may include –

- outsourced recruitment organisations (including background checking, psychometric assessments, video interviewing etc.);
- resourcing teams who assess and administer your application for employment at AUK;
- third party providers who facilitate discussions with current employees to enable you to talk about working for Aspen;
- relevant entities to process your financial data (HR, Payroll and Reward teams);
- insurance and healthcare entities;
- technical support teams;
- survey providers;
- third party providers of welcome merchandise

How does AUK protect your personal data?

As required by applicable Data Protection laws, Aspen has implemented physical, electronic and operational technical and security measures and controls, policies and procedures to safeguard and secure the data we collect, process and store throughout the lifecycle of that data.

All AUK staff have a legal duty to respect the confidentiality of information and access to confidential information is restricted to only those who have a reasonable need to access it. Technical controls implemented may include database encryption, email encryption, identity and access management solutions, comprehensive network protection and antivirus solutions.

AUK ensures appropriate contracts and data sharing agreements are executed when sharing data with third parties, ensuring that at least an equivalent level of security is offered by our partners and suppliers. These contracts incorporate EU/UK standard contractual clauses where personal data is transferred without an adequacy decision to third countries outside of the UK/EU/EEA.

What automated decision making may be conducted?

If you are seeking employment via our Early Careers Program, candidates may be asked to complete an online assessment. The results from the assessment will determine if the candidate moves to the next stage of the recruitment process or not. This process is handled by a third party, with the results communicated to Aspen’s Human Resource team, who will then continue the recruitment process for those candidates who passed the online assessment. AUK does not use any other form of automated decision making.

What rights do you have over your personal data?

You generally have the following rights under GDPR and UK GDPR, which you can usually exercise (you may have other rights subject to the jurisdiction that you are in and should look at the jurisdiction specific sections below) –

Access to a copy of your personal data	The right to be provided with a copy of your personal data.
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data.
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data in certain situations (as we may have legal obligations to retain certain data).
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.

To object to use	<p>The right to object –</p> <ul style="list-style-type: none"> · At any time to your personal data being used for direct marketing (including profiling); · In certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests.
Not to be subject to automated decision making without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by our website.</p>

If you would like to exercise any of these rights, please contact our Data Protection Officer at;

30 Fenchurch Street, London EC3M 3BD or via email (dpo@aspen.co)

How do I ask a question or make a complaint?

If you have any complaints, queries or wish to exercise your data protection rights, please contact Aspen’s Group Data Protection Officer at;

30 Fenchurch Street, London EC3M 3BD or via email (dpo@aspen.co).

Where you are dissatisfied with any aspect of our handling of your personal data, you have a right to lodge a complaint with the relevant authority responsible for data protection in your jurisdiction. In the UK this is the Information Commissions Office (ICO). The ICO’s contact details are set out below

Information Commissions Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Telephone: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

How do I make a data subject access request?

If you wish to invoke any of your rights under relevant privacy regulations or to make a general enquiry regarding Aspen’s approach to securing your data, please do so by contacting Aspen’s Group Data Protection Officer (dpo@aspen.co).

Please note that only you or someone that you authorise to act on your behalf may submit these requests. Your request must provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information and sufficient detail to allow us to properly understand, evaluate and respond to your request.

In response to such request, we may also ask you to verify your identity or to provide additional information that helps us to understand your request better. Once we have the necessary information from you regarding proof of identity, or in the case of an agent, proof of authorisation, and your request is valid, we will respond to you as soon as possible but no later than within 30 days unless the number and complexity of the requests made be deemed excessively high, in which case we may extend this time by a maximum of a further two months. We will inform you if we need to make use of this additional time and why we need to do so as soon as is practicably possible.

How and when will this Privacy Notice be updated?

This Privacy Policy is subject to regular review and may be updated from time to time.

This Notice was last update on 14th March 2025.