Prime Candidate Privacy Notice

Purpose

Prime Global is committed to processing candidate personal data fairly, lawfully, transparently and securely. This Candidate Privacy Notice explains how personal data relating to job applicants, prospective employees, contractors, consultants and other recruitment candidates is collected, used, shared, retained and protected throughout the recruitment and selection process. It also sets out candidates' privacy rights and how Prime Global complies with applicable data protection legislation when processing candidate personal data.

Scope

This Candidate Privacy Notice applies to all individuals who apply for employment, worker, contractor, consultant, temporary, internship or other engagement opportunities with Prime Global. It covers all personal data processed by Prime Global during the recruitment, selection, assessment and onboarding process, including information collected directly from candidates and from third parties where permitted by law. The notice applies to all systems, records, technologies and business processes used to collect, store, use, share, retain and protect candidate personal data. Once a candidate becomes an employee, worker, contractor or consultant, the processing of their personal data will be governed by the applicable workforce privacy notice.

Policy Statement

Prime Global is committed to protecting the privacy and confidentiality of candidate personal data and to processing such information fairly, lawfully, transparently and securely throughout the recruitment and selection process. Candidate personal data will only be collected, used, shared and retained where there is a valid lawful basis to do so and for purposes that are relevant to assessing suitability for employment or engagement, meeting legal and regulatory obligations, protecting the rights and interests of candidates and Prime Global, and supporting effective recruitment activities. Appropriate technical and organisational measures will be

implemented to safeguard candidate personal data against unauthorised access, loss, misuse, alteration or disclosure. Prime Global will respect and facilitate candidates' data protection rights in accordance with applicable data protection legislation and will ensure that candidate information is retained only for as long as necessary and securely disposed of when no longer required.

Procedures

1. About this privacy notice

This privacy notice explains how Prime Global Medical Communications Ltd collects, uses, stores, shares and protects personal data about job applicants, candidates and prospective workers.

It applies where you apply for a role with us, are considered for a role, are contacted about an opportunity, or are otherwise involved in our recruitment and selection processes.

This notice applies before any employment, worker, contractor or consultancy relationship begins. If you become employed or engaged by us, our employee privacy notice or other relevant workforce privacy information will apply.

2. Legal framework

This notice has been prepared to comply with applicable UK data protection and privacy laws, including:

- the UK General Data Protection Regulation;
- the Data Protection Act 2018;
- the Privacy and Electronic Communications Regulations 2003, where relevant; and
- the Data (Use and Access) Act 2025, including relevant amendments made by that Act.

Together, these are referred to in this notice as the "Data Protection Laws".

3. Who we are

Prime Global Medical Communications Ltd is the controller of the personal data described in this privacy notice.

Our details are:

Prime Global Medical Communications Ltd
Mere House
Brook Street
Knutsford
Cheshire
WA16 8GP
United Kingdom

Company number: 03642172

In this privacy notice, "Prime", "we", "us" and "our" mean Prime Global Medical Communications Ltd.

You can contact us about this notice or about how we use your personal data by using the details below:

Email: dataprotection@primeglobalpeople.com
Compliance contact: complianceofficer@primeglobalpeople.com
Telephone: +44 (0)1565 752100
Post: Prime Global, Mere House, Brook Street, Knutsford, Cheshire WA16 8GP, United Kingdom

4. Personal data we collect

We may collect and use the following types of personal data during recruitment:

- identity and contact details, such as your name, address, telephone number, email address and other contact information;
- application information, such as your CV, cover letter, application form, work history, qualifications, skills, professional memberships and references;
- recruitment and assessment information, such as interview notes, assessment results, test results, feedback, salary expectations, notice period and role preferences;
- right to work and identity verification information, such as passport, visa, work permit, share code and right to work check records;
- background screening information, where relevant to the role and permitted by law;
- communications information, such as emails, messages, call notes and correspondence with you;
- information from publicly available or professional sources, such as LinkedIn, job boards, professional websites or industry directories;
- referral information, where someone refers you for a role;
- equal opportunities and diversity information, where you choose to provide it or where we are permitted or required to collect it; and
- legal, compliance and complaints information, such as records needed to respond to data protection requests, complaints, disputes or legal claims.

Some of this information may be special category personal data under the Data Protection Laws, for example health information, disability information, ethnicity, religion or sexual orientation. We will only use this type of information where the law allows us to do so.

Where permitted by law, we may also process criminal offence information where necessary for the role, our legal obligations, regulatory compliance, safeguarding, fraud prevention, workplace safety or protection of our business.

5. How we collect personal data

We may collect personal data:

- directly from you, including through your CV, application form, interviews, assessments, emails or other communications;
- through recruitment platforms, applicant tracking systems or job boards, including Workable where used;
- from recruitment agencies, search firms or referral sources;
- from LinkedIn, professional websites, databases, public sources or other direct sourcing channels;
- from referees or former employers, where appropriate;
- from background screening, right to work or identity verification providers, where relevant;
- from our employees, managers, People & Culture, recruitment, legal, compliance or other internal teams; and
- from regulators, professional bodies, government bodies, courts or law enforcement agencies where relevant.

Where we collect your personal data directly from you, this notice should be made available at or before the point your personal data is collected.

Where we collect your personal data indirectly, for example through LinkedIn, a database, a job board, a referral or direct sourcing, we will provide this notice within the timeframe required by Article 14 of the UK GDPR. This will usually be within one month, or earlier where we first contact you before then.

6. How and why we use personal data

We will only use personal data where we have a lawful basis under the Data Protection Laws. The table below explains the main purposes for which we use candidate personal data, the types of personal data used, and the lawful bases we rely on.

Purpose	Personal Data Used	Lawful Basis
To receive, assess and manage your application	Identity and contact details; application information; communications information	Legitimate interests in managing recruitment and assessing suitability for roles; steps prior to entering into a contract
To communicate with you about your application or potential opportunities	Identity and contact details; communications information; role preferences	Legitimate interests in managing recruitment communications; steps prior to entering into a contract
To assess your suitability for a role	Application information; recruitment and assessment information; interview notes; test results	Legitimate interests in selecting suitable candidates; steps prior to entering into a contract
To conduct interviews, assessments and recruitment exercises	Recruitment and assessment information; communications information	Legitimate interests in operating a fair and effective recruitment process
To verify identity, qualifications, experience, references or right to work	Identity and contact details; right to work information; application information; reference information	Compliance with legal obligations; legitimate interests in verifying candidate suitability and protecting our business
To carry out background checks where relevant and lawful	Background screening information; identity information; role information	Compliance with legal obligations where applicable; legitimate interests in protecting our business, clients and workforce; substantial public interest or legal claims conditions where special category or

		criminal offence data is involved
To make an offer and prepare employment or engagement documents	Identity and contact details; application information; salary expectations; right to work information	Steps prior to entering into a contract; legitimate interests in recruitment administration; compliance with legal obligations
To consider you for future suitable roles	Identity and contact details; application information; recruitment notes; role preferences	Legitimate interests in talent management and recruitment, unless consent is required in a particular case
To monitor and improve our recruitment process	Recruitment and assessment information; equal opportunities data where provided; application outcome data	Legitimate interests in improving recruitment and workforce planning; substantial public interest where equality monitoring involves special category data
To handle data protection requests, complaints, disputes or legal claims	Identity and contact details; communications information; legal, compliance and complaints information	Compliance with legal obligations; legitimate interests in responding to complaints and protecting legal rights; legal claims conditions where special category data is involved
To comply with legal, regulatory, audit and reporting obligations	Relevant recruitment, compliance and legal records	Compliance with legal obligations; legitimate interests in demonstrating compliance and protecting our business

We do not usually rely on consent for core recruitment processing. Where we do rely on consent, we will make this clear and you can withdraw it at any time.

You can object to processing based on legitimate interests, although we may continue where we have compelling legitimate grounds or where processing is needed for legal claims.

The Data (Use and Access) Act 2025 introduced a limited category of "recognised legitimate interests" into UK data protection law. We do not generally expect to rely on recognised legitimate interests for ordinary recruitment processing. If we rely on this lawful basis in a relevant case, we will do so only where permitted by the Data Protection Laws.

7. Special category and criminal offence data

- We may process special category personal data where necessary and lawful, for example where:
- you provide health or disability information so that we can make reasonable adjustments during recruitment;
- we process equal opportunities information for diversity monitoring;
- health or safety information is relevant to a role or assessment; or
- the information is needed to establish, exercise or defend legal claims

We may process criminal offence information only where permitted by law and where relevant to the role or required for legal, regulatory, safeguarding, client, security or risk management reasons.

8. Automated decision-making

We do not make recruitment decisions about you based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significant effects.

We may use recruitment systems to help manage applications, organise candidate information or support the recruitment process. However, recruitment decisions are not made solely by automated means.

9. Who we share personal data with

We may share candidate personal data where necessary and lawful with:

- other Prime group companies;
- People & Culture, recruitment, hiring managers, interviewers, legal, compliance, finance, IT and management teams;
- recruitment platforms and applicant tracking system providers, including Workable where used;
- recruitment agencies, search firms or referral partners;
- background screening, right to work and identity verification providers;
- referees, former employers or professional bodies, where appropriate;
- IT, cloud storage, hosting, communications, security and business systems providers;
- assessment, testing or interview platform providers;
- auditors, accountants, lawyers, insurers and other professional advisers;
- external investigators, consultants or advisers where required;
- HMRC, immigration authorities, courts, tribunals, law enforcement bodies, regulators and other public authorities where required or permitted by law;
- prospective buyers, investors, funders or advisers in connection with a business sale, merger, restructuring or similar transaction; and
- other third parties where you ask us to share your information or where we have another lawful basis to do so.

Where third parties process personal data on our behalf, we require them to protect the data and only use it in accordance with our instructions and applicable law.

10. International transfers

We are based in the UK, but we may transfer candidate personal data outside the UK where necessary, including to Prime group personnel, overseas offices or service providers that operate internationally.

Where we transfer personal data outside the UK, we will ensure that appropriate safeguards are in place, unless an exemption applies. These may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, the EU Standard Contractual Clauses where applicable, Data Privacy Framework certification where relevant, or another transfer mechanism permitted by UK data protection law.

11. How long we keep personal data

We keep candidate personal data only for as long as necessary for the purposes for which it was collected, including to manage recruitment, consider future roles, meet legal or regulatory requirements, respond to complaints, manage disputes, establish or defend legal claims, maintain audit records and protect our legitimate business interests.

Category of data	**Typical retention period**
Unsuccessful candidate application records	Usually up to 12 months after the recruitment process ends, unless a longer period is needed for legal, regulatory, dispute or audit reasons
Talent pool or future opportunity records	Usually up to 24 months, where appropriate and lawful
Successful candidate records	Transferred to the relevant employee, worker, contractor or consultant personnel file and retained in accordance with the applicable workforce retention rules
Right to work check records	Retained in accordance with legal requirements where applicable

Data protection request, complaint or dispute records	Retained for as long as necessary to manage the request, complaint, dispute or legal claim
Equal opportunities monitoring data	Retained only as long as necessary for monitoring and reporting purposes, usually in anonymised or aggregated form where possible

When personal data is no longer required, we will delete it, anonymise it or securely archive it.

12. Your data protection rights

Subject to certain conditions and exemptions, you have the following rights under the Data Protection Laws:

- the right to access your personal data;
- the right to have inaccurate or incomplete personal data corrected;
- the right to ask us to delete your personal data in certain circumstances;
- the right to ask us to restrict the use of your personal data in certain circumstances;
- the right to object to processing based on legitimate interests;
- the right to data portability, where applicable;
- the right to withdraw consent, where we rely on consent; and
- rights relating to certain automated decisions that have legal or similarly significant effects

When responding to an access request, we may ask you to confirm your identity or clarify the request. Where permitted by law, the response period may pause while we wait for clarification that we reasonably need. We are required to carry out reasonable and proportionate searches when responding to access requests.

13. Data protection complaints

If you have a concern or complaint about how we use your personal data, please contact us first so that we can investigate and respond.

You can contact us at:

Email: dataprotection@primeglobalpeople.com
Post: Prime Global, Mere House, Brook Street, Knutsford, Cheshire WA16 8GP, United Kingdom
Telephone: +44 (0)1565 752100

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your personal data or handled your complaint.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
United Kingdom

Website: https://ico.org.uk/make-a-complaint/
Telephone: 0303 123 1113

Roles and Responsibilities

Role	Responsibility
Employee Website Users	Awareness, read and understand
Website Users	Ensuring that any personal data they submit through the website is accurate and up to date.
IT	Maintain appropriate technical and organisational security measures to protect personal data collected through the website
Marketing	Ensure website forms, marketing activities and online content comply with the requirements of this notice and notify the Legal & Compliance Team of any proposed changes to website functionality, tracking technologies or data collection activities.

Related Policies and References

N/A

Document Owner and Approval

The {INSERT JOB TITLE] is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the management system and at least annually.

This procedure was approved by [INSERT JOB TITLE] on DD/MM/YYYY and is issued on a version-controlled basis under their signature.

Document Control

Version	Date Approved	Approved By (Name)	Changes Made
V1.0	21/10/2026	Buffy Bowles	Final Sign Off