



Co. Reg. 11842783

Mo-Sys Holding Ltd Privacy Notice for Job Applicants

We are Mo-Sys Holding Ltd, a company registered in England and Wales with a company number 11842783, we are a Data Controller and will be responsible for your personal data. This privacy notice has been designed to inform data subjects of Mo-Sys Holding ltd. and all It's subsidiary's how we collect and process your personal data, why this data is collected and inform you of your privacy rights when applying for a role with any of the subsidiaries within the Mo-Sys Holding group.

You can contact us in any of the following ways:

By phoning us on +44 208 858 3205;

By emailing us on dpo@mo-sys.com; or

By writing to us at Mo-Sys Holding, Thames Bank House, Tunnel Avenue, London, SE10 0PA, UK.

We may update this privacy notice from time to time, this version was last updated on 15/04/2025.

1. Key Definitions

Data Controller is the organisation or person responsible for deciding how personal information is collected, stored, and used.

Data Processor is an organisation or person that the Data Controller may appoint to carry out certain tasks on their behalf involving personal information.

Personal Information is information that can be used to identify any living individual, this does not include information that has been made anonymous.

Special Information requires extra protection under data protection law. This category of personal information is classed as sensitive and includes information relating to health, racial and ethnic origin, political opinions, religious and similar beliefs, trade union membership, sexual orientation. Genetic and biometric information would also be included.

Partly automated decision-making and profiling means using automated systems to assist in the decision-making process but where there has been meaningful human involvement in the decision and not solely an automated decision. Profiling analyses aspects of a candidate's behaviour, personality and interests to make a decision about them.

Predictive Index a tool used as part of the recruitment process; the assessment measures a candidate's behavioural drives which is assessed according to suitability of the specific role. This also includes a cognitive assessment.

ICO Information Commissioners Office is the supervisory authority for data protection in the UK.



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2. Details of Personal Information we collect, Use and Why

We collect the following personal information to process your job application:

- Full name
- Email address
- Telephone number
- Curriculum Vitae (CV)

We collect the following personal information to assess suitability of the specific job role:

- Employment history, previous experience, skills and qualifications
- Current level of remuneration, including benefit entitlements
- Information about your entitlement to work in the UK
- Assessment Interview, cognitive assessment and behavioural assessment
- Employment references

We will not collect or process any forms of special category information during the recruitment process unless requested by you to make any required reasonable adjustments to the recruitment process in relation to any health, disability or accessibility needs. We may also incidentally capture this information if you have provided without our request, for instance this information has been included within your CV or covering letter. In these circumstances, our condition for collecting special categories of information would be that this information has been made public by the data subject (Article 9(2)(e)).

Successful candidates will be provided with the Mo-Sys Holding Privacy Notice for Employees which outlines the personal data collected at the final stages of the recruitment process.

3. Lawful basis

UK data protection law stipulates that we must have a "lawful bases" for collecting and using your personal information. You can find out more information about lawful bases <u>Here</u> on the ICO website.

Our lawful basis for collecting or using personal information for **Processing your application** is:

• Legitimate Interest: We have a legitimate interest to gather this personal information to assess which candidates' skill set and experience are suitable for the job role requirements. CV's and applications are reviewed at this stage to shortlist candidates for the next stages of the recruitment process.

Our lawful basis for collecting and using personal information for **Assessing suitability to the job role:**

• Legitimate Interest: We have a legitimate interest to gather this personal information to assess which candidates' skill set and experience are suitable for the job role requirements and therefore suitable for employment and fulfilling the role.





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 Legal obligations: We have a legal requirement to perform right to work checks before employment to ensure that a candidate is legally entitled to work in the UK.

4. Where we get this personal information from

Directly from you: This information will be provided directly from you if applying for a role via the careers page on the Mo-Sys website, a recruitment website or submitting an application and covering letter via email to careers@mo-sys.com or to any other employee within the Mo-Sys group. You will also directly provide personal information during any interview process or predictive index assessment.

Third parties or publicly available sources:

- Previous employee references: We may choose to request an employee reference when previous employee contact details are provided.
- Recruitment agencies: We work with a select group of approved recruitment agencies for specific roles and may collect personal data on candidates as provided by a selected recruiter for specified open roles. Your data will be treated in line with this policy and this policy will be provided to any candidates who we decide to continue through the next stages of the recruitment process.
- Linked In: Linked In may be used for posting jobs or contacting potential candidates. Special attention will be paid to individuals privacy settings, any Linked In users that have opted out of being contacted by recruiters will not be contacted.
- Current Employees: Your personal information may be submitted by an employee of Mo-Sys Holding or any employee of its subsidiaries as part of the employee referral programme. This is only permitted if you have consented to your personal information being shared.

5. Partly automated decision-making and profiling

As part of the recruitment process, you may be asked to complete the predictive index cognitive and behavioural assessment, this tool is used to help us identify the suitability of a job applicant for a specific role. This part of the recruitment process would take place after screening all applicants and initial interviews, you will only be asked to complete this step if successful in the beginning stages of the recruitment process.

The way the assessment works:

A "job target" is created by the recruitment manager and the relevant hiring manager(s), this is set when defining the role scope, requirements and responsibilities. Candidates who are selected and successful at the initial interview will then be sent a link to the Predictive Index using name and email address to complete the two-part assessment (PI behavioural and the cognitive assessment).

The behavioural assessment evaluates an individual's behavioural drives and the cognitive assessment measures verbal, numerical and reasoning abilities. The results are then compared





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against the job target to determine alignment with the role in question. Once the assessment is completed, our Chief of Staff will review the results and arrange a time to meet with all candidates that have completed the assessment to discuss the results as part of the interview process. We do not solely rely on automated decision making or profiling when making a final decision on a candidate's suitability for a role, the final decisions whether to progress a candidate is solely made by the Mo-Sys team involved in the recruitment process.

6. How long we keep personal information

We will only store your information for as long as necessary to fulfil the purpose for which the information was collected. If your application for employment is unsuccessful, we will store your data for a period of 12 months after the end of the recruitment process and the position advertised is filled. If your application is successful, your personal data will be transferred to a personal file and retained during your employment, at which point you would receive a separate data privacy notice which outlines the relevant retention schedule.

Retention schedule for Recruitment:

Record	Retention Period
Name	12 months post
	campaign
Email address	12 months post
	campaign
Telephone number	12 months post
	campaign
Curriculum Vitae (CV)	12 months post
	campaign
Employment history, previous experience, skills & qualifications	12 months post
	campaign
Current level of remuneration, including benefit entitlements	12 months post
	campaign
Information about your entitlement to work in the UK	12 months post
	campaign
Assessment Interview, Predictive Index Results	12 months post
	campaign
Employment references	12 months post
	campaign

There may be instances where we believe it would be beneficial to store your information for a different purpose and therefore longer than the timeframe specified above, in this instance, you would be informed, and we would only retain this information with your consent. This may include retaining your CV for future planned recruitment.



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7. Who we share personal information with

We may need to share your personal information with other organisations or people. This includes:

- Other companies within the Mo-Sys Holding group who may act as joint Data Controllers or as Data Processors, these companies will only receive information as required.
- Internally within the organisation for the purpose of recruitment. The persons your information will be shared with will be restricted to the Recruitment Manager, Chief of Staff, Managers in the department with a vacancy, Senior department members if involved in the interview process.
- Predictive Index, we will share your name and email address to facilitate the ability to
 complete the assessment, no other personal information is shared with this company.
 The Predictive Index company act as a third-party processor, we will continuously ensure
 that necessary agreements are in place so that they process data only as instructed by
 us, comply with all the security obligations under the data protection regulations,
 immediately notify us of any data breach and restrict access to data a need-to-know
 basis.
- Ashby is the chosen software used as an ATS (Applicant Tracking System). When applying
 for a role via a recruitment website, the information you have provided will be processed
 and tracked using this platform. Ashby act as a third-party processor, we will
 continuously ensure that necessary agreements are in place so that they process data
 only as instructed by us, comply with all the security obligations under the data
 protection regulations, immediately notify us of any data breach and restrict access to
 data a need-to-know basis.

8. Sharing information outside of the UK

Transfer of personal information outside of the UK for recruitment purposes is restricted by UK Data Protection laws. However, we are permitted to share personal information outside of the UK when sharing with other branches of our organisation which in some cases, may be international branches in the USA, Bangkok or Europe, in this instance, you would be informed ahead of any transfer, and this would only be done if necessary for the fulfilment of the particular role.

We are permitted to transfer personal information to third party processors outside of the UK subject to key principles under the UK GDPR regulations, these principles state that transfer can be made to countries with an adequacy decision, meaning that these countries data protection practices are deemed adequate by the UK. We transfer data outside of the UK when processing information via the Predictive Index and the Applicant Tracking system, both companies operate out of the USA. The USA has been deemed adequate by the UK on the provision that the company in question is certified to the UK Extension and appear on the Data Privacy Framework List. We will continue to monitor these provisions to ensure that any personal data transfer is



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deemed adequate and ensure that agreements are in place with both companies to comply with security obligations under the UK data protection regulations.

9. Your data protection rights

Under UK data protection law, you have certain rights in relation to your personal information which are set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO website

- Your right of access: You have the right to request copies of your personal information that we hold, also known as a Subject Access Request (SAR). This includes any outcomes or results relating to all stages of the recruitment process. You can also request details about where personal data has come from and who it is shared with.
- Your right to rectification: You have the right to ask us to correct personal information you believe to be inaccurate or incomplete. However, it is a candidate's responsibility to ensure the information provided for the recruitment process is accurate.
- Your right to erasure: You have the right to ask us to delete your personal information.
- Your right to restriction of processing: You have the right to ask us to limit how we use your personal information. We may ask that you provide the particular reason for this limitation as limitation can only be implemented in some circumstances.
- Your right to object to processing: You have the right to object to the processing of your personal data however, this would likely mean that you will be withdrawn from the recruitment process.
- Your right to not to be subject to solely automated decision-making and processing.

To exercise any of the above data protection rights, please make a request by contacting us using the contact details listed at the beginning of this notice. If you choose to make a request, we must respond to you without undue delay and in any event within one month.

10. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the beginning of this notice.

If you remain unhappy with our response and how we have used your data, you can also complain to the ICO.

ICO address:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113

Website: https://ico.org.uk/make-a-complaint