

Applicable for individuals applying for work

Cambridge Innovation Capital Limited and its subsidiaries, being Cambridge Innovation Capital Manager Limited and any future subsidiaries of either party, (CIC, we, us or our) are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

CIC is a data controller. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This privacy notice is relevant if you are applying for work with us, whether as an employee, worker or contractor. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

1. Data Protection principles

We will comply with data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used
- in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

2. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are **special categories** of more sensitive personal data which require a higher level of protection.

In connection with your application, we will collect, store, and use the following categories of personal data about you:

- the information you have provided to us in your CV and covering letter or other
- summary of work experience;
- any information you provide to us during an interview; and
- any other information you provide to us as part of the application process.

We may also collect, store and use the following "special categories" of more sensitive personal data:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; and
- information about criminal convictions and offences.

3. How is your personal data collected?

We will collect personal data about applicants from some or all of the following sources:

- you, the candidate;
- the recruitment agency that we have appointed to assist us in the recruitment process;
- your named referees; and
- publicly accessible sources such as LinkedIn and Companies House.

4. How we will use information about you

We will only use your personal information when the law allows us to.

Most commonly, we will use the personal data we collect about you where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests. This will include to:

- assess your skills, qualifications, and suitability for the role;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and

We will also use your personal information to comply with legal or regulatory requirements.

5. If you fail to provide personal data

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

6. How we use particularly sensitive personal data

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

We may use your particularly sensitive personal data in the following ways:

- in limited circumstances, with your explicit written consent;
- where we need to carry out our legal obligations or exercise rights in relation to your application, for example to consider your disability status, in case we need to provide appropriate adjustments during the recruitment process, for example in relation to arranging an interview. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data; and

- where it is in the public interest, for example to ensure meaningful equal
- opportunity monitoring and reporting in relation to race or national or ethnic origin,
- religious, philosophical or moral beliefs, or your sexual life or sexual orientation.

7. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

8. Recipients of your personal data

We may disclose your personal data to members of our team in respect of the role you are applying for in order to take hiring decisions.

It may also be necessary from time to time for us to disclose your personal data to third parties or agents. We will only share your personal data with the third parties for the purposes of processing your application. All our third-party service providers and other entities within our group are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. Transfer of personal data outside the United Kingdom or EEA

The personal data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom or European Economic Area ("EEA"), for the purposes described above. Where your information is transferred outside the United Kingdom or EEA, we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards, such as relying on applicable approved standard contractual clauses which give personal information the same protection it has in the United Kingdom or EEA, and that it is treated securely and in accordance with this privacy policy.

10. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. How long will you use my information for?

We will retain your personal data for a period of six months after we have communicated to you our decision about whether to appoint you to role. We retain your personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal data in accordance with our data retention policy.

12. Your rights in connection with personal data

You have the right under certain circumstances:

- to be provided with a copy of your personal data held by us;
- to request the rectification or erasure of your personal data held by us;
- to request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your personal data, including the right to object to marketing sent by us; and
- to request that your provided personal data be moved to a third party.

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us using the details below.

You can also exercise the rights listed above at any time by contacting us at enquiries@cic.vc

13. Candidate responsibilities

You should use all reasonable endeavours to keep us informed of any changes to your personal and special personal data. If you become aware of a data breach or a potential data breach in respect of personal data please report the matter immediately to us at enquiries@cic.vc

14. Complaints

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.html). The Information Commissioner is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data.

15. Further Information

If you require any further clarification regarding this privacy notice, please contact us at:

Cambridge Innovation Capital
22 Station Road, Cambridge, CB1 2JD
+44 (0) 1223 856593
enquiries@cic.vc