Coeo

Candidate Privacy Policy



Coeo Candidate Privacy Notice

1. Introduction

We are Coeo Ltd. We help businesses to improve their decision-making and resilience through the effective use of data. Coeo is a private limited company registered in England & Wales (05901228). Our registered address is Now Building, Thames Valley Park Drive, Reading, Berkshire, England, RG6 1RB. Our Data Protection Act registration number is Z1975617. This notice applies to candidates applying for roles with Coeo in the UK.

We are the data controller for the personal data we process about candidates applying for a role with us.

This Candidate Privacy Notice explains how we collect, use, store, share and protect your personal data when you apply for a role with Coeo, whether directly, through our recruitment system, via a recruitment agency, referral, careers website or other recruitment channels.

Please read this notice carefully before submitting your application. If you already work for Coeo and are applying for another role, this notice applies to your application alongside our employee privacy notice.

2. Who We Are

Coeo Limited is the data controller for the personal information you provide during the recruitment process. This means we determine how and why your personal information is processed.

If you have any questions about this notice or how your personal data is handled, please contact:

People, Culture & Experience Team
Email: peopleteam@coeo.com and gdpr@coeo.com

3. What Information We Collect

During the recruitment process, we may collect and process the following information:

- Personal Information
- Name
- Address
- Telephone number
- Email address
- Date of birth (where required)
- Nationality and right to work information

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- Recruitment Information
- Details of any relationship you have with a current Coeo employee, which we ask you to tell us about
- CV or résumé
- Cover letter
- Employment history
- Qualifications and certifications
- Skills, experience and professional memberships
- Interview notes and assessment results
- References (where applicable)

Depending on the role you are applying for, where relevant and legally permitted, we will collect:

- Right to work documentation
- Identity verification information
- Background screening results
- Criminal conviction information
- Special Category Data, including health or disability information required to provide reasonable adjustments during the recruitment process

We usually carry out these checks after we have made you an offer and before you start work with us. Any offer we make will depend on these checks being completed to our satisfaction.

4. **How We Collect Information**

We collect personal information from:

- You directly
- Your application submitted through our recruitment systems
- Recruitment agencies acting on your behalf
- Professional networking sites such as LinkedIn
- Referees nominated by you
- Background screening providers where applicable
- Publicly available professional sources

5. **How we use your information and our reasons for using it**

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We only use your personal information where the law allows us to. This is how we use it, and the reason (legal basis) we rely on for each purpose:

- To assess your suitability for the role, manage the recruitment process, arrange interviews and assessments, and communicate with you about your application: taking steps at your request before entering into an employment contract.
- To verify the information you give us, including references and identity checks needed to make you an offer: taking steps at your request before entering into an employment contract.
- To check your right to work in the UK and meet other legal and regulatory obligations: compliance with a legal obligation.
- To provide reasonable adjustments during recruitment: compliance with a legal obligation. Because this involves health or disability information, we also rely on our obligations under employment law.
- To carry out criminal conviction checks where the role requires them and the law allows: our legitimate interests in making sure candidates are suitable for roles of trust.
- To identify and manage any conflicts of interest, such as a relationship with a current employee: our legitimate interests in making sure recruitment decisions are fair.
- To keep your details for future roles after our usual retention period: your consent.
- To establish, exercise or defend legal claims: our legitimate interests and, for special category data, the legal claims condition.

Special category and criminal conviction information

Where we process special category data, such as health or disability information, we rely on employment law obligations to provide reasonable adjustments. We only process criminal conviction information where the role requires it and the law allows it, and we rely on the employment condition in Schedule 1 of the Data Protection Act 2018. We maintain an Appropriate Policy Document. To carry out credit checks where the role requires them: our legitimate interests in making sure candidates are suitable for roles involving financial responsibility or access to sensitive client information.

Where we rely on our legitimate interests, we have considered whether they are outweighed by your rights and interests. You have the right to object to this use of your information (see ‘Your Rights’).

Giving us your personal information is voluntary, but we cannot assess your application without the information we need to do so.

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6. Who We Share Your Information With

Your personal information may be shared with:

- Members of Coeo involved in the recruitment process
- Hiring managers and interviewers
- A Coeo employee who has referred you
- Recruitment service providers
- Background screening and verification providers
- Recruitment technology providers, including applicant tracking systems
- Professional advisers where necessary
- Regulatory or law enforcement authorities where required by law

Where we use third parties to help us with recruitment, such as recruitment technology providers, background screening providers and recruitment agencies, we have written agreements in place to protect your personal data.

Our data processors only act on our instructions and are carefully selected to ensure they have robust security measures in place and comply with UK data protection law. We take steps to ensure that any sub-processors they use are subject to the same standards. Our main recruitment technology provider is Greenhouse Software, which provides our applicant tracking system. We use Greenhouse to receive and manage applications and to communicate with you about them.

Some organisations we share information with, such as professional advisers, regulators or law enforcement authorities, will be separate data controllers responsible for how they use it. We will never sell your personal data or share it in a way you would not reasonably expect.

7. International Transfers

Coeo is part of a group that operates internationally, and some of our service providers are based outside the UK.

If your personal data is transferred outside the UK, we only do so where appropriate safeguards are in place, such as a UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses. We also assess that your data will receive protection that is not materially lower than it has in the UK. You can ask for a copy of these safeguards by emailing GDPR@coeo.com.

8. Data Security

Coeo takes the security of your personal data seriously.

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We maintain appropriate technical and organisational measures designed to protect personal information against accidental loss, unauthorised access, alteration, disclosure or destruction.

Access to candidate information is restricted to individuals who have a genuine business need to access it.

9. How Long We Keep Your Information

Successful candidate information will form part of the employee personnel record. If you accept an offer and start work with us, your information will become part of your employee record. We will give you our employee privacy notice, which explains how we use your personal data as an employee.

For unsuccessful candidates, personal information will typically be retained for up to 12 months following the conclusion of the recruitment process, unless:

- A different retention period is required by law;
- We are required to retain information for legal or regulatory purposes; or
- You have provided consent for us to retain your information for future employment opportunities.
- We have made you an offer that is later withdrawn or declined, in which case we may keep information about the pre-employment checks for as long as we need it to deal with any questions or claims.

At the end of the applicable retention period, candidate personal data will be securely deleted or anonymised so that you can no longer be identified.

10. Your Rights

You have the following rights under the data protection laws:

Right to know

You have the right to be told how your personal data is being processed. If we offer you a role, we will give you our employee privacy notice at the same time. It explains how we use your personal data from that point.

Right of access

You have the right to ask us for a copy of your personal data. We will respond within one month, or within three months in total if your request is complex or you have made several requests. We carry out a reasonable and proportionate search for your personal data, and we may pause the time limit if we need more information from you to find it or to confirm who you are. You are not required to pay a fee.

Right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

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Right to erasure

You have the right to ask us to erase your personal data in certain circumstances.

Right to restriction of processing

You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Rights in relation to automated decision making

We do not use automated decision-making, including AI, to make decisions about your application.

Right to object to processing

You have the right to object to us processing your personal data where we consider this is necessary for us to perform a task in the public interest. You can also object to us using your personal data for direct marketing purposes or where we process your personal data based on our legitimate interests.

Right to data portability

You have the right to ask that your personal data is transferred (ported) from us to another organisation or given to you. This applies to information you have given to us where we are processing your information based on your consent or for contractual purposes and the processing is automated.

Right to complain

You have the right to complain to us about how we handle your personal data. You can do this by emailing GDPR@coeo.com or by writing to us at Coeo Limited, Now Building, Thames Valley Park Drive, Reading, Berkshire, England, RG6 1RB. You do not need to use any particular words or mention data protection law; just tell us what you are unhappy about. We will acknowledge your complaint within 30 days, look into it without undue delay, keep you informed of progress and tell you the outcome.

We work to high standards when it comes to processing your personal data. We hope you will always be happy with the way we handle your information, however if we have not met your expectations, please let us know so we can put things right.

If you remain dissatisfied, you also have the right to complain to the Information Commission (formerly the Information Commissioner's Office, or ICO), the UK's data protection regulator. Further information about your data protection rights can be found on the Information Commission's website (www.ico.org.uk) .

11. Changes to this Privacy Notice

We may update this Candidate Privacy Notice from time to time to reflect changes in legal requirements, business operations or recruitment practices.

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The latest version will be made available through our recruitment systems and careers website.

12. Contact Us

If you have any questions regarding this Candidate Privacy Notice or wish to exercise your data protection rights, please contact:

GDPR@Coeo.com

Version Control

Version	Sections	Description of change	Author	Effective Date
1.0	All	New Policy	Lois Walden & Firebird	November 2026

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