



## Recruitment: Data Privacy Notice

June 2017

## MBNA

Your information will be held by MBNA Limited (part of the Lloyds Banking Group), its group companies and affiliates. More information on Lloyds Banking Group can be found at [www.lloydsbankinggroup.com](http://www.lloydsbankinggroup.com) and MBNA Limited at [www.mbna.com](http://www.mbna.com).

Your personal information will be held securely in MBNA Limited and in Lloyds Banking Group systems so that we and any other companies in our Group that you have dealings with, either now or in the future, can look after your potential employment relationship with the Lloyds Banking Group. This will include information you provide when you apply to us, and any additional information provided by you or others in various ways, including:

- (a) emails and letters, during telephone calls (which may be recorded) and conversations.
- (b) information Lloyds Banking Group companies receive from each other and from other organisations such as credit reference agencies, fraud prevention agencies, and referees.

We will not retain your personal information for longer than is necessary for processing your application, or for legal or regulatory requirements.

We may share and use the personal information we hold about you across the Lloyds Banking Group and with our suppliers / subcontractors for the following administrative activities:

- (a) processing your employment records (by way of example only) through the use of HR online systems, learning platforms, performance management systems and payroll and pensions systems;
- (b) business planning, (by way of example only) reporting and forecasting;
- (c) safety and security issues (by way of example only) managing buildings' access control;
- (d) responding to your enquiries and complaints;
- (e) updating, consolidating, and improving the accuracy of our records;
- (f) managing your access and use of systems, testing new systems and checking upgrades to existing systems;
- (g) crime detection, prevention, and prosecution;
- (h) employee administration and managing your relationship with the Lloyds Banking Group companies;
- (i) to fulfil regulatory obligations.
- (j) market research and quality surveys, including evaluating the effectiveness of our recruitment process and/or the performance of our suppliers / subcontractors
- (k) applying a colleague indicator to accounts / products you hold with Lloyds Banking Group, to allow colleague discounts to be applied and analysis of anonymised data, to assist us in understanding colleague advocacy and providing better colleague offerings for you.

By sharing this information it enables us, and other companies in the Lloyds Banking Group, to manage your relationship with us in the efficient way that you expect. Your data may also be used for other purposes for which you give your specific permission, or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998. If you leave our employment your personal data will not be held for longer than necessary, unless required for legal or regulatory requirements.

The Government also requires us to screen applications that are made to us to ensure that we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.

To comply with money laundering regulations, there are times when we need to confirm (or reconfirm) your name and address. This information may be shared with other group companies. For more details about identity checks, please refer to: [mbnacareers@mbna.com](mailto:mbnacareers@mbna.com)

The Data Protection Act defines certain information as 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences). If you make an application to us we may ask you for some 'sensitive' details. We will use this information to process your application and we will ask for your explicit consent.

The majority of this information will play no part in the selection process and it will only be used to assist with equal opportunities monitoring. We will, however, consider information relating to your financial history and criminal convictions/ prosecutions in deciding whether to proceed with your application and/or continue with any offer of employment.

When applying for a role within MBNA Limited (part of the Lloyds Banking Group), we may request some diversity information. If provided, your diversity information will be treated as confidential, will be held separately, and will play no part in the recruitment process.

All countries in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal information. Lloyds Banking Group companies may manage your personal information from centres outside the EEA (such as the USA and India) that do not have a similar standard of data protection laws to the UK. If so, those Lloyds Banking Group companies will require your personal information to be protected to at least UK standards.

When you apply for a position Lloyds Banking Group companies may use an automated process as part of our decision making. If you submit an application and it is declined through this automated process, you can contact us within 21 days to have the decision reconsidered. You also have the right to ask that the decision is not made based solely using an automated process.

We may ask you to provide physical forms of identity verification when you apply for a position. Alternatively, we may search credit reference agency files in assessing your application, including searches on any past or other names used by you and searches on addresses where you have lived for the past five years. The agency also gives us other details and information from the Electoral Register to verify your identity. The agency keeps a record of our search, whether or not your application proceeds. Our search is not seen or used by lenders to assess your ability to obtain credit, although it may be used for debt tracing and to prevent money laundering.

You have a right to apply to the credit reference agencies for a copy of your file.

Lloyds Banking Group companies carry out most of our credit searches using Experian, but details may be disclosed to all the credit reference agencies. The information they hold may not be the same and there is a small fee that you may need to pay to each agency that you apply to. Their addresses are:

Experian Ltd, Customer Support Centre, PO Box 8000, Nottingham, NG80 7WF or log on to [www.experian.co.uk](http://www.experian.co.uk)

Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS or log on to [www.equifax.co.uk](http://www.equifax.co.uk)

Consumer Services, Callcredit Limited, PO Box 491, LEEDS, LS3 1WZ or log on to [www.callcredit.co.uk](http://www.callcredit.co.uk)

As part of our recruitment process we will ask candidates to provide a full six year employment / academic history including absence information. This information provides us with an explanation of a candidate's past work experience, including details of any gaps or periods of unemployment and academic background, and may be used to obtain references.

If you provide details of a referee, it is your responsibility to ensure the referee is aware that you have forwarded his/her details and is happy for you to do so. Since individuals have a right under the Data Protection Act 1998 to see their personal data, and references provided to us form part of the set of personal data, we cannot guarantee the complete confidentiality of any reference.

Fraud prevention databases have been established for the purpose of allowing employers to share data on their employment fraud cases.

Should any investigation identify fraud or the commission of any other offence by you when applying for or during your employment with us, we will record the details of this on the relevant fraud prevention databases. This information may be accessed from the UK and other countries and used by law enforcement agencies and by us other employers (and potential employers) to prevent or detect fraud.

The Disclosure and Barring Service or Disclosure Scotland will refer the details provided on this application form to government and law enforcement bodies in accordance with any relevant legislation. The details provided to these bodies will be used for identifying possible matches to records held by them. Where such a match is established, data may be released to the Disclosure and Barring Service or Disclosure Scotland for inclusion on any certificate issued. The details provided on this form may be used to update the records held by the bodies specified above. The details provided on this application form may be used to verify your identity for authentication purposes.

Lloyds Banking Group is required by the Disclosure and Barring Service or Disclosure Scotland Codes of Practice to treat all applicants who have a criminal record fairly and not discriminate because of a conviction or other information revealed. It also obliges us to have a written policy on the recruitment of ex-offenders; a copy of which can be given to Disclosure applicants at the outset of the recruitment process.

Whilst processing your application we may contact you by email or SMS message.

During the recruitment process we may research comments and opinions made public on social networking sites such as LinkedIn, Facebook and Twitter.

Under the Data Protection Act you have the right of access to your personal data. If anything is inaccurate or incorrect, please let us know and we will correct it. For further details on how to request a copy of your information please email [mbnacareers@mbna.com](mailto:mbnacareers@mbna.com).

In general, you can visit Lloyds Banking Group websites without identifying who you are or revealing any information about yourself. However, cookies are used to store small amounts of information on your computer, which allows certain information from your web browser to be collected. Cookies are widely used on the internet and do not identify the individual using the computer, just the computer being used. Cookies and other similar technology make it easier for you to log on to and use our websites during future visits.

To access our cookie notice, please go to:

<http://www.lloydsbankinggroup.com/cookie-notice/>

We keep our privacy notice under regular review and we will reflect any updates within this notice. This privacy notice was last updated on 1<sup>st</sup> June 2017

For further information please contact: [mbnacareers@mbna.com](mailto:mbnacareers@mbna.com)