

## Candidate privacy notice

### Who are we?

We are Monzo Bank Limited (“we”, “our”, “us”) and operate under the name Monzo. We’re registered with the UK data protection authority (the Information Commissioner’s Office or ICO) under number ZA108184. This notice explains what personal information we collect when you apply for a job at Monzo and how we use it.

Got a question about something in this notice, or want to contact our Data Protection Officer (DPO)? Please don’t reach out via in-app chat - that’s for account queries for our customers only. Instead, you can:

- Email us at [dpo@monzo.com](mailto:dpo@monzo.com)
- Write to us at Monzo, Broadwalk House, 5 Appold Street, London EC2A 2AG

### The information we collect about you

When you apply for a job or let us know you’re interested, we may ask for:

- Your name and contact details (like your address, phone number and email address)
- The type of work you’re looking for
- Your work and educational history (typically in your CV)
- The country you’re applying from and your right to work in the UK
- Your responses to application questions and other information you give us through potential take-home tasks
- Details of your current and/or desired salary and other things relating to compensation and benefits packages
- Your current notice period

If we invite you for an interview, we collect:

- details of any special needs you want us to know about, so we can make adjustments for your interview.
- any other information you give us, or observations we make through interviews, that are relevant for your application.
- a form of identification, proof of address and current and previous addresses, and insurance numbers so that we can carry out ‘Right to Work’ checks.

- details about former managers or colleagues you want us to contact as referees.

Giving this information is optional, but if you choose not to we might not have enough information about you to consider your application.

We'll also ask for the following 'special category' data:

- Ethnicity
- Gender identity
- Sexual orientation
- Disability & neurodiversity status

Giving us special category data is completely voluntary, and the data will remain anonymous. There's more information about how we'll use it below.

### **Information we get from outside Monzo**

We may also get your contact details and professional profile from:

- recruitment or executive search agencies.
- professional networking sites or other public sources such as social media and job boards.

If you're invited for an interview and are offered a position at Monzo we'll also collect:

- the results of your background checks from background checking agencies we work with. This will include information about criminal convictions if you have a record, details recorded on the Cifas database (if applicable) and your immigration status, if you're not from the UK.
- references from previous employers, managers or colleagues we contact to learn about you.

### **How we use your information**

European data protection laws say we need to have a legal basis for using your personal data. At least one of the following must apply:

- **Contractual duty:** This is when we need the information to process your application to enter into an employment (or other) contract with you.
- **Legal duty:** This is when a law or regulation says we must collect the information to decide if we can enter into an employment (or other) contract with you.
- **Legitimate interest:** This is when we need to use your data for our legitimate interests, or those of a third party. It means using data in a way that you

expect us to, for a reason which is in your and/or our (or a third party's) interest and which doesn't override your privacy rights.

- **Public interest:** This is when we need the information to perform a specific task in the public interest that's set out in law.
- **Vital individual interest:** This is when we need to use your information to protect your life, and have no way of asking for your permission.
- **We have your consent.**

In this section we explain which one we rely on to use your data in a certain way.

**We need to use your data to enter into a contract with you, so we can:**

- contact you during the hiring process.
- carry out background checks
- carry out fraud prevention checks via Cifas.
- consider your suitability for a role you're applying for.
- get references and vet information you give us in your CV.

**We need to use your data to comply with the law, so we can:**

- make sure you have the right to work in the UK.
- run criminal background checks (DBS checks). We run them for everybody who works at Monzo, but they're only required by law for Senior Manager and/or Non-Executive Director roles.
- learn about your fitness and suitability for a Senior Manager Role (as part of the Financial Conduct Authority's 'fit and proper test').

**We need to use your data when it's in our 'legitimate interest', so we can:**

- run our recruitment and promotion processes (including our applicant tracking system).
- keep a copy of your application data if you let us know you want to be considered for other roles. (See 'How long we keep it' below.)
- share your contact details with our travel provider if you need to travel to an interview or stay at a hotel.

**We need your consent to use your data, so we may ask:**

- for your permission to carry out criminal background checks (unless you're being considered for a Senior Manager and/or Non Executive Director role, in which case these checks are mandatory under the law).
- if you want to share details about yourself on a voluntary basis to help us with our diversity and inclusion monitoring.

## How we use your 'special category' data

We may need to process sensitive information about job applicants that data protection laws call 'special category' data. This is information that can reveal a person's racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic or biometric data (if used for identification purposes) and data concerning a person's health, sex life or sexual orientation.

Data protection laws say we need a second lawful basis to process 'special category' data in addition to contractual or legal duty, legitimate interest, public interest, vital individual interest or consent. This second lawful basis can be: explicit consent, exercising legal rights in the field of employment, protecting vital interests, establishing, defending or exercising legal claims or reasons of substantial public interest. We can also process 'special category' data that customers have chosen to share publicly. In this section we explain which lawful bases we rely on to use your 'special category' data in a certain way.

### **Using the data is necessary for reasons of substantial public interest.**

If you answer our identity survey when you apply for a job with Monzo, we collect and use information you share about your sexuality, racial and ethnic origin and health with your consent and for reasons of substantial public interest. We need to use this information to make sure we give job applicants equal opportunity and treatment regardless of their demographic.

Responding to the survey is voluntary and won't affect your application in any way.

Once we've collected the data, we can only see it in anonymised and aggregated format in relation to the role you're applying for. It won't be connected to your application on our interface. We'll view the aggregated data for hiring pipelines retrospectively: the reports we run will always be one month behind, so your data won't be included in our reports while you're going through the process.

Greenhouse (the company that stores identity survey responses for us) keeps a copy that they can link to your application. You can ask us to delete it at any time. To request this, please contact [dpo@monzo.com](mailto:dpo@monzo.com).

## Who we share your data with 🤝

### Companies that help us recruit, and need to process your details.

This includes:

- recruitment or Executive Search agencies that help us with the recruitment process.
- Vero Screening, a company who run background and reference checks on our behalf. and help us with background checks (read [Vero's Privacy Notice](#) to learn more).
- Cifas (via Vero Screening), a fraud prevention community (joint data controller)
- recruitment software service providers, like Greenhouse and HiBob.
- cloud computing power, storage and software providers, like AWS and Google Cloud.
- our travel provider TravelPerk, if you need to travel to a job interview and/or stay at a hotel, or relocate to work for Monzo

### References if your application is successful

- We reach out to the referees you've listed to learn more about you (we only share your name and where we're calling from).

### The FCA and other authorities

- We have a legal duty to let the FCA know about certain roles we fill. This includes declaring if a candidate (for a senior role) has a criminal record in certain circumstances.

### Public bodies

- We ask the Disclosure and Barring Service to check your criminal record, if this is necessary for the role
- In some circumstances, we may share your details with other parties. This is to comply with the law or to protect our rights, property or safety.

### Consultants and legal advisors

- We may share your details with consultants and legal advisors if this is necessary to resolve an issue or get advice on your suitability for a role.

### Cifas (fraud prevention community)

If you're offered a role with Monzo, we will kick off background checks with our screening partner, Vero, and the personal information you have shared with us during the hiring process will be shared with Cifas as part of our background check process. Cifas will use this information to prevent fraud, other unlawful or dishonest conduct,

malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment, and your offer with Monzo may be withdrawn. Your personal information will also be used to verify your identity. More details about how your information will be used by us and Cifas, and your data protection rights, can be found at <https://www.cifas.org.uk/fpn>. If you have any questions about this, you can email our Data Protection Officer at [dpo@monzo.com](mailto:dpo@monzo.com).

## How long we keep your data

If your application is unsuccessful, we delete some of your information, like the results of criminal record checks, immediately. If you're unsuccessful and agree that we can keep your information for other job openings, we keep it for 1,000 days after we close the hiring process. We need to keep a copy of all applications for at least 6 months in case we face a legal challenge about our decision.

## Where we store or send your data

We may transfer and store the data we collect from you to organisations outside the European Economic Area ('EEA'). When we do this, we make sure that your data is protected:

- The European Commission says the country or organisation has adequate data protection.
- We've agreed to standard [data protection clauses](#), approved by the European Commission, with the organisation.

If you want a copy of the relevant data protection clauses, please email [dpo@monzo.com](mailto:dpo@monzo.com).

## Your rights

You have a right to:

- Access the personal data we hold about you (make a data subject access request)
- Ask for a copy of your personal data in a portable (machine-readable) format or make us send it to someone else
- Make us correct inaccurate data
- Ask us to delete, block or suppress your data. For legal reasons, we might not always be able to do so. There may be times when we continue to use your data when we say it's in our 'legitimate interest'

- Withdraw any consent you've given us
- Ask a member of staff to review an automated decision

To do any of these things, please email [dpo@monzo.com](mailto:dpo@monzo.com) with your request. EU data protection laws give us one month to take action.

## How to make a complaint

If you have a complaint about how we use your information, please email [dpo@monzo.com](mailto:dpo@monzo.com) and we'll do our best to fix the problem. You can also reach our Data Protection Officer in this way.

If you're still not happy, you can refer your complaint to a data protection supervisory authority in the EU country you live or work in, or where you think a breach has happened. The UK's supervisory authority is the Information Commissioner's Office (ICO). For more details, visit their website at [ico.org.uk](https://ico.org.uk).