

Diligenta Recruitment Privacy Notice

VERSION 2.0 Diligenta

This notice can be accessed via the Diligenta website

Version Control

Name of Owner	Title
Lesley Roe	Data Protection Officer
Rob Summers	Head of People Operations and Change

Version Control

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1.0	Ioana Williams	1 st Standalone Privacy Notice for Recruitment	June 2026
2.0	Lesley Roe	Refresh	July 2026

Introduction

Diligenta Limited (“**Diligenta**” and “**we**”, “**our**” or “**us**”), is a UK based FCA regulated subsidiary of Tata Consultancy Services (TCS), specialising in the provision of business process services for the Life and Pensions Industry.

This Privacy Notice lets you know what happens to any personal data that you give to us, as part of the recruitment process, or any that we may collect from or about you as well as information about:

- Who to contact with a question or query
- Our legal basis for processing & purpose of processing
- Access to and disclosure of your Personal Data
- Transfers and processing of your Personal Data to third parties and/or third countries
- Technical and organisational measures (security) to protect your Personal Data
- Retention of your Personal Data
- The Rights you have in relation to your Personal Data

We issue a different Privacy Notice, which applies if you are successful in the recruitment process and become a Diligenta employee. If you become a member of Diligenta staff, the Diligenta Employee Privacy Policy is located on the Diligenta Intranet.)

Diligenta is registered with the Information Commission - Reference Number: Z9387633.

We are committed to protecting the privacy and security of your Personal Data and have developed this Privacy Notice to inform you of the data we collect, what we do with your information and what we do to keep it secure. This privacy notice will let you know the following:

- Our Contact Details
- Why we have your Personal Data
- Our legal basis for processing & purpose of processing
- Access to and disclosure of Your Personal Data
- Transfers and processing of Your Personal Data to third parties and/or third countries
- Technical and organisational measures (security) to protect Your Personal Data
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Contact Details

If you have questions or queries relating to your Personal Data, please contact:

Data Protection Officer
Diligenta Ltd
Lynch Wood
Peterborough
PE2 6FY

Email: data.protection@diligenta.co.uk

Our Data Protection Officer is Lesley Roe.

Why we have your Personal Data

We may collect your personal data directly and through our recruitment partner; Sanderson to facilitate and manage the recruitment process.

The circumstances in which we may collect your personal data are:

- You are a prospective employee, and you are applying for a job.
- You submit an application via diligentacareers.co.uk or diligentacareers.co.uk/view-jobs.asp; and/or Sanderson.

Personal Data

We will ensure that personal data collected is:

- Processed lawfully, fairly and in a transparent manner
- Processed for the specified, explicit and legitimate purposes
- Maintained adequately, and limited in use to what is necessary in relation to the purpose
- Maintained in an accurate format and kept up to date
- Appropriate measures to protect against unauthorised or illegal access by internal or external parties
- Retained for no longer than necessary as defined in our Retention Schedule

If you apply for a vacancy via our website, please note that [Sanderson Recruitment Talent Solutions](https://sandersonplc.com) (Sandersonplc.com) is our recruiter who will process your personal data. We will see personal data of selected candidates in order to make assessments about suitability for a role and interview.

If you are successful, we will collect greater levels of personal data to assess suitability.

Please note the below are examples and are not exhaustive.

- **Personal information:**
Any previously used name; address (including email); residence and contact information; phone numbers; date of birth; right to work verification; visa information; marital status; dependents; gender; images including CCTV (if you attend one of our offices for an interview); and other data collection required by law.
- **Company-related information:**
Employment background and details; job title; role; function and grade; employer; work location/s; hire and termination dates; employee number; previous supervisor or manager.
- **Compensation information:**
Salary; statutory or contractual benefits; and other compensation.

- **Payroll information:**
Tax information; court orders; holiday; time off and absence information; National Insurance Number, other national identification numbers; and bank account details.
- **Background information:**
County Court Judgments (CCJs); bankruptcy; educational, training and qualification background; referencing; and other background information commonly used for security screenings, where applicable.
- **Disclosure & Barring Service:**
The existence of a criminal record, e.g. through the Disclosure & Barring Service (DBS) (formerly Criminal Record Bureau (CRB)), but not the criminal record itself.

Special Categories of Personal Data

We may also process the following special categories (“Sensitive Personal Data”) of Your Personal Data:

- Information about ethnic origin; and the processing of certain data concerning health (e.g. medical data relating to background information, occupational health, and disability to make adjustments to accommodate you in the workplace).

Processing of Special Categories of Personal Data may occur if needed for business purposes, or if it is required in order to comply with applicable law, such as to accommodate a disability.

Legal Basis for Processing

We will only process Your Personal Data to the extent:

- Processing is necessary for the performance of a contract (e.g. performance of your employment contract or other contractual work agreement with us, including steps prior to entering into such a contract); or
- Processing is necessary for compliance with a legal or statutory obligation; or
- Processing is necessary for the purposes of the legitimate interests
- In limited circumstances, we may also ask for your consent to process your Personal Data

Disclosure of Your Personal Data

We may use third parties who provide elements of services for us. Where we use third parties we seek to:

- exercise appropriate due diligence in the disclosure of your Personal Data to such third parties
- require, via contract or otherwise, that such third parties implement and maintain adequate technical and organisational security measures to safeguard your Personal Data
- ensure that your Personal Data is only processed as instructed by us or required by law.

We will not share your information with any third parties for the purposes of direct marketing.

We may also process, disclose, and transfer your Personal Data to government departments, law enforcement agencies and regulators (such as the Information Commissioner's Office (ICO)), social organisation (e.g., a social benefits agency), statutory bodies (e.g. the Financial Conduct Authority (FCA)), courts and other tribunals where legally required to do so.

Transfers and Processing of Your Personal Data

Our parent company, Tata Consultancy Services Limited (TCS), is based in India, as are some of its subsidiary companies and service providers, and some of those are outside the UK and EEA.

We sometimes also use third party suppliers to help us deliver services and products, for the purposes listed below. When we do so we carry out due diligence assessments to ensure the supplier has appropriate data protection and security standards and our contracts include stipulations governing the processing of personal data in accordance with applicable data protection laws, regulations and regulatory guidance.

- CRM system providers
- IT and business services providers
- Payment service providers
- External Auditors
- Legal advisors
- Survey/ research management providers
- Software applications, platform and website
- Analytics, social media and marketing management, website live chat

Your personal data may be processed if necessary and lawful, for the prevention and detection of crime, to conduct sanctions checks.

Where your personal data is transferred to third parties outside of the UK and EEA, we only do this, if there is an adequacy regulation, otherwise we conduct a transfer risk assessment and ensure the transfer to the third-party organisation is subject to appropriate safeguards (not limited to International Data Transfer Agreement, EU Standard Contractual Clauses and certification with EU - US DPF and UK extension), so that your personal data is provided essentially equivalent level of protection to that of the UK and EU.

- If we are required to by law, or under any statutory code, or if we are requested by a government or regulatory authority.
- If we are investigating or defending any legal claims.

We do not sell your personal data.

Technical and Organisational Measures (security of your data)

We have appropriate technical and organisational measures and in place to protect your personal data.

We are ISO27001 certified.

Retention of Your Personal Data

If your application is unsuccessful, we will hold Your Personal Data for one year after the end of the relevant recruitment process. At the end of that period, your Personal Data will be deleted or destroyed.

Should you like more information on our recruitment partner Sanderson Managed Services Limited, including their retention periods and their privacy policy which sets out how they handle your data, please contact them at dataprivacy@sandersonplc.com.

Where Diligenta acts as a controller you have the following rights to the information, we hold about you:

- **Right to be Informed** - This is our obligation to you to provide transparency in how we use your Personal Data.
- **Right of Access** - You have the right to a copy of your Personal Data and supplementary information.
- **Right to Rectification** - You can ask us to correct or amend your Personal Data if it is inaccurate or incomplete.
- **Right to Erasure** - Also known as 'the right to be forgotten', you can request the deletion or removal of your Personal Data where there is no legitimate reason for continued processing.
- **Right to Restrict Processing** – You can ask us to limit processing your Personal Data, meaning we can store it but process it no further.
- **Right to Object to Processing** - Where this is done, you can object to the processing of your Personal Data for direct marketing, profiling (processing evaluating certain things about you).
- **Right to Data Portability** - Where you have provided us with your Personal Data in an electronic form, you can obtain and reuse this for your own purposes.
- **Rights to Challenge Automated Decision Making & Profiling** - You have a right to challenge any decision and seek an explanation where a decision is based solely on automated processing and that decision produces a legal effect or significantly affects you.

- **Right to withdraw consent** - In the very limited circumstances, where you may have provided your consent to the processing of your Personal Data for a specific purpose, you may have the right to withdraw your consent. To withdraw your consent, please contact our Data Protection Officer (see contacts below). Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so.
- **Right to complain** - You have a right to complain to us about how your personal data is handled, when we process data as a Controller. Should you wish to make a complaint to us regarding the handling of your personal data please contact: data.protection@diligenta.co.uk and we will send an acknowledgement to you within 30 days and investigate your complaint promptly.

Should you wish to exercise any of these rights, please contact data.protection@diligenta.co.uk

Should you not receive a satisfactory response to your data protection complaint, you have the right to escalate to our regulator, the Information Commissioner's Office (ICO).

For contact details please visit: www.ico.gov.uk or:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Some of these rights may be restricted in certain circumstances. If such restrictions apply, we will inform you.

Changes to this Privacy Notice

Diligenta reviews this Privacy Notice at least once a year and updates it when appropriate.

Last Review July 2026.