

CANDIDATE PRIVACY POLICY

With effect from: JULY 2026

1 Introduction

Fonix is committed to protecting your privacy. This notice explains what personal data we collect about you during our recruitment process, why we collect it, and what your rights are in relation to it. Please read it carefully.

2 Who we are and how to contact us

For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018), Fonix PLC (company number 05836806, registered at 23 Heddon Street, London, W1B 4BQ) is the "data controller" of the personal data we process about you during the recruitment process. This means we are responsible for deciding how and why your personal data is used.

3 The personal data we collect about you

We collect, store and use a range of personal data about you during the recruitment process. This may include:

3.1 Information you give us

- Identity and contact details – your name, address, telephone number, email address and, where relevant, photographs you choose to include.
- Application content – the information in your CV, cover letter and application form, including your qualifications, skills, employment and education history, and the reasons for your application.
- Right-to-work information – your nationality and immigration status, and copies of documents (such as a passport or share code) that evidence your right to work in the UK.
- Recruitment process information – notes and feedback from interviews, the results of any assessments or tests, and our correspondence with you.
- Any other information you choose to share with us during the process.

3.2 Information we obtain from others

- References from previous employers or other referees you nominate.

- Information from recruitment agencies, job boards or, where relevant, publicly available professional sources such as LinkedIn.
- The results of background, employment-verification, financial or criminal-records (DBS) checks carried out by approved providers.

3.3 Special category and criminal records data

Some of the data we process is treated as more sensitive under data protection law, such as information about your health, ethnicity, religion, sexual orientation, or criminal records. We only collect this type of data where we have a lawful basis to do so. For example, to monitor equality of opportunity (where you volunteer the information), to make reasonable adjustments to our process, or to carry out a DBS check.

4 How we use your personal data and our lawful basis

Under data protection law we must have a valid lawful basis for using your personal data. The table below sets out the main purposes for which we use your data and the lawful basis we rely on for each. Where we rely on legitimate interests, we have considered the impact on your interests and rights and are satisfied that our use is proportionate.

What we use your data for	Why we're allowed to use your data
Assessing your skills, qualifications and suitability for the role, and managing the recruitment process generally	Legitimate interests (recruiting for our business) and, where you are offered the role, taking steps at your request before entering into a contract.
Communicating with you about your application and arranging interviews or assessments	Legitimate interests (recruiting for our business) and, where you are offered the role, taking steps at your request before entering into a contract.
Verifying your right to work in the UK	Legal obligation
Carrying out reference, background or DBS / financial checks	Legitimate interests (recruiting for our business) and, where you are offered the role, taking steps at your request before entering into a contract. Legal obligation, where applicable

What we use your data for	Why we're allowed to use your data
Equal opportunities monitoring (where you choose to provide this information)	Special category, processing necessary for identifying or keeping under review the existence or absence of equality of opportunity (DPA 2018, Schedule 1)
Making reasonable adjustments to our recruitment process for a disability or health condition	Compliance with a legal obligation (Equality Act 2010); for health data, processing necessary in the field of employment law
Keeping records and, where necessary, establishing, exercising or defending legal claims	Legitimate interests (recruiting for our business) and, where you are offered the role, taking steps at your request before entering into a contract. Compliance with a legal obligation
Keeping your details on file to consider you for future opportunities	Consent (which you can withdraw at any time)

If you fail to provide certain types of information when requested — for example evidence of your right to work — we may not be able to process your application or, ultimately, to employ you.

5 Automated decision-making

We do not currently make decisions about candidates based solely on automated processing (that is, without any human involvement) where those decisions produce legal effects or similarly significantly affect you. Where any automated tools are used to help sort or screen applications, a member of our team reviews the outcomes before any decision is made.

6 Who we share your personal data with

We share your personal data only where necessary and with appropriate safeguards in place. Recipients may include:

- Members of our recruitment, HR and hiring teams, and the managers responsible for the role you have applied for.
- Our candidate tracking system, which processes data as a processor on our behalf and only in accordance with our instructions.
- Background-check, reference and right-to-work verification providers.

- Professional advisers (such as legal advisers) where necessary, and regulators or other authorities where we are required to share information by law.

Where third parties process data on our behalf, we put written contracts in place requiring them to keep your data secure and to use it only for the purposes we specify.

7 International transfers

We are based in the UK and store candidate data in the UK or European Economic Area (EEA) wherever possible. If any of your personal data is transferred outside the UK – for example because a service provider hosts data elsewhere – we ensure an appropriate safeguard is in place, such as a UK adequacy regulation, an International Data Transfer Agreement (IDTA), or the UK Addendum to the EU Standard Contractual Clauses.

8 How we keep your data secure

We have put in place appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful access, loss, alteration or disclosure. Access to your data is limited to those involved in the recruitment process, and all such individuals are subject to a duty of confidentiality.

9 How long we keep your data

If your application is successful, the personal data we have gathered during recruitment will become part of your employee record and will be retained and used in accordance with our privacy policy.

If your application is unsuccessful, we will retain your personal data for up to six (6) months after we notify you of our decision, after which it will be securely destroyed. We keep it for this limited period so that we can respond to and, if necessary, defend any complaint or legal claim arising from the recruitment process.

If you have given consent for us to store your details and personal data on our files to be considered for future roles, we will retain your data on that basis until you exercise your right to delete it or you withdraw your consent.

10 Your rights

You have the following rights in relation to your personal data under data protection law:

- Request access to a copy of the personal data we retain
- Request correction of inaccurate or incomplete data
- Right to delete, where there is no legitimate reason or lawful basis for us to retain it
- Object to or restrict our processing of your data in certain circumstances
- Request the transfer of certain data to you or another party (data portability)
- Withdraw your consent at any time where we are relying on consent (this does not affect processing carried out before you withdrew it).

If you have concerns about how we handle your personal data, we would encourage you to contact us so we can try to resolve them. You also have the right to complain to the Information Commissioner's Office (ICO), the UK regulator for data protection, at ico.org.uk

11 Changes to this notice

We may update this privacy notice from time to time. When we make significant changes we will take appropriate steps to bring them to your attention.