Pliant Payments Limited Careers Privacy Policy

This privacy policy applies for your job application at Pliant Payments Limited and its affiliated companies (hereinafter referred to as "Pliant"). Please note that if you visit our website at https://www.getpliant.com, our website privacy policy applies additionally.

The following describes the scope and purpose of the collection and use of personal data by Pliant in connection with your application and informs about the rights to which the applicant/you are entitled under data protection law. Definitions of the terms used (e.g. "personal data" or "processing") can be found under UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018.

Pliant takes your data protection very seriously and treats your personal data confidentially and in accordance with the statutory provisions. Accordingly, your personal data will not be sold, and will only be passed on to third parties where necessary and in accordance with applicable law and/or where you consent is obtained.

1. Controller

Controller for the processing of personal data in connection with your application is:

Pliant Payments Limited
8 Bishopsgate, Huckletree, Level 2
London, United Kingdom, EC2N 4BQ
Email: info@getpliant.com

2. Contact Details of the Data Protection Officer

Our data protection officer is available to provide you with information on the issue of data protection under the following contact details:

Katharina A. Weimer, LL.M. (UNSW)
Fieldfisher Tech Rechtsanwaltsgesellschaft mbH
Landsberger Str. 110
80339 Munich
Germany
E-Mail: info@fieldfisher.com
Web: www.fieldfisher.com

3. Which personal data do we process?

If you apply to Pliant for a vacant position or send us an unsolicited application, we process the following personal data about you (“Application Data”) for the purposes of carrying out the recruitment process. Application data is primarily collected directly from you as part of your application. In addition, we may process personal data obtained from publicly accessible sources (e.g. professional networks such as LinkedIn and/or Xing) or received from third parties, where you have authorised or consented to such disclosure.

The following categories of personal data may be processed in this context:

- Identification and contact data (e.g. name, surname, address, email address, phone number, date and place of birth, country, job position)
- Application documents (e.g. cover letter, CV, former activities, qualifications, salary request)
- Profile in social media networks (e.g. LinkedIn, Xing)
- Additional information voluntarily provided by you (e.g. photos, indications regarding a disability or other data voluntarily provided during the recruitment process)
- Interview and assessment Data (e.g. notes taken during interviews or recruitment-related meetings, written summaries, evaluations and internal assessments, transcripts or structured summaries of interviews, and where applicable, audio or video recordings of interviews or meetings)
- AI-generated outputs (e.g. summaries, notes, insights generated with the support of third party service providers and/or AI-supported technologies (e.g. Notion AI, Gemini AI, Ashby Inc.), which may be used to assist in documenting and evaluating interviews
- Application metadata (e.g. application status, timestamps, communication history)

We need your Application Data for the evaluation and selection of candidates for employment with Pliant. Your Application Data will be processed for the purposes of managing our recruitment related activities, which include setting up and conducting interviews and as is otherwise needed in the recruitment and hiring processes.

4. Legal basis for processing

We process your personal data on the following legal bases:

- Article 6(1)(b) UK GDPR – processing necessary to take steps prior to entering into a contract
- Article 6(1)(f) UK GDPR – legitimate interests (efficient recruitment process)
- Article 6(1)(a) UK GDPR – consent (e.g. interview recordings)

Where special category data is processed (e.g. health or diversity data), we rely on:

- Article 9(2)(b) UK GDPR
- Schedule 1 of the Data Protection Act 2018

5. How long do we keep your personal data?

We store your data as long as it is necessary for the conclusion of the recruitment process. If an employment relationship is not established between you and us we may store your personal data for purposes of preservation of evidence to protect against possible legal claims. Generally, we delete your personal data within a time period of six months following the conclusion of the recruitment process.

Furthermore, if no employment relationship is established between you and us, we may store your personal data for a longer period to consider your application for future open position at Pliant and its affiliates if you have given us the consent to do so, however, in any event no longer than for a period of three years.

Where we engage third party service providers (e.g. applicant tracking systems), the deletion of personal data is carried out in accordance with our instructions and applicable retention requirements.

6. Reliability checks

If you receive an employment offer from Pliant, we will carry out certain reliability and background checks before finalizing your hiring process.

These checks are required in order to:

- Comply with anti-money laundering (AML) regulations
- Meet our obligations towards contractual partners
- Safeguard the integrity and reliability of new hires, particularly in sensitive roles.

If you receive an offer, we may conduct checks where appropriate, including:

- Right-to-work verification
- Employment history verification
- Criminal background checks (for relevant roles only)

These checks are carried out in compliance with applicable UK law.

7. Recipients of data

As part of the application process, we may transfer your Application Data to the following recipients:

- Affiliated companies of Pliant, insofar as this is necessary for carrying out the application process or you have given us your consent to do so
- Social media networks (e.g. LinkedIn, Xing), if you contact us through them
- Service providers / data processors in terms of Art. 28 GDPR who support us in the processes related to the application process.

Our service providers are strictly bound by instructions and contractually obligated to us accordingly. These are service providers of the following categories:

- Cloud and software service providers for the operation of our career site, for the online application portal and applicant tracking system (e.g. Bamboo HR, Ashby, Inc.),
- Office applications (e.g. Google Workspace).
- Service providers of communication, recording, transcription and productivity, including AI-supported technologies (e.g. Ashby AI, Notion AI, Gemini AI)

We may transfer your personal data to service providers located outside the United Kingdom.

Some of these recipients are located in countries that may not provide the same level of data protection as the UK. Where this is the case, we ensure that appropriate safeguards are in place to protect your personal data in accordance with applicable data protection laws.

Where personal data is transferred outside the UK, we rely on one of the following safeguards:

- Adequacy regulations issued by the UK government, where the destination country is deemed to provide an adequate level of data protection;
- The UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, approved by the UK Information Commissioner's Office (ICO);
- Other legally recognised transfer mechanisms where appropriate.

Where personal data is transferred to the United States, we may also rely on participation of the recipient in the UK Extension to the EU-US Data Privacy Framework, where applicable.

In situations where no appropriate safeguards are available, we may transfer your personal data based on your explicit consent, in accordance with Article 49(1)(a) UK GDPR. In such cases, you will be informed of any potential risks associated with the transfer.

We take all reasonable steps to ensure that your personal data is treated securely and in accordance with this privacy policy, including implementing contractual protections, technical safeguards, and access controls.

8.Use of AI-supported technologies

As part of our recruitment processes, we may use AI-supported technologies in defined processing contexts, in particular for the documentation of interviews and for supporting recruitment-related workflows. Depending on the respective processing activity, personal data is processed either on the basis of your consent or on the basis of our legitimate interests.

In compliance with applicable data protection laws, in connection with Article 50(1) of the EU Artificial Intelligence Act, candidate interviews may be recorded and/or transcribed using AI-supported technologies (e.g. Ashby AI, Notion AI, Gemini AI) for the purpose of documentation, evaluation and ensuring accurate and consistent interview records.

Where such recordings take place:

- you will be informed in advance;
- recordings and AI-supported transcription will only be carried out on the basis of your prior consent;
- you have the right to refuse recording or request an alternative, non-recorded interview format without any disadvantage.

All AI-generated transcripts will be:

- Securely stored and accessible exclusively to authorized personnel directly involved in the recruitment and selection process
- Retained only for the duration necessary to complete the recruitment evaluation, after which they will be permanently and securely deleted, unless further processing is necessary to comply with statutory retention obligations or for the establishment, exercise or defence of legal claims.

In compliance with applicable data protection laws and Article 50(1) of the EU Artificial Intelligence Act, we may use AI-supported technologies (e.g. OpenAI, Gemini AI, Claude AI) to support and streamline recruitment-related workflows, including the structuring and organisation of application data, the generation of summaries and internal documentation, the categorisation or evaluation of information, and the reduction of manual and administrative workload, whereby the processing of personal data is based on our legitimate interest in ensuring an efficient, consistent and scalable recruitment process.

The decision-making process regarding your application remains entirely with the personnel involved in recruitment and selection. The AI-supported technologies are used solely in a supportive capacity and do not determine or influence the assessment or outcome of your application.

No decisions are based on profiling, and your personal data is not used to train, improve or further develop underlying AI models.

9. What are your data subject rights?

As a data subject under the UK General Data Protection Regulation (UK GDPR), you have the following rights:

- **Right of access**
  You have the right to request access to your personal data and obtain a copy of the personal data we hold about you.
- **Right to rectification**
  You have the right to request that we correct any inaccurate or incomplete personal data.
- **Right to erasure**
  You have the right to request the deletion of your personal data in certain circumstances.
- **Right to restriction of processing**
  You have the right to request that we restrict the processing of your personal data in certain cases (e.g. while we verify its accuracy or assess an objection).
- **Right to withdraw consent**
  Where processing is based on your consent, you may withdraw your consent at any time with effect for the future. Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal. Refusing or withdrawing consent will not disadvantage your application, although certain processes (such as interview recordings or transcriptions) may no longer be available.
- **Right to data portability**
  You have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit that data to another controller, where applicable.
- **Right to object**
  You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data where such processing is based on our legitimate interests (Article 6(1)(f) UK GDPR). If you object, we will cease processing your personal data unless we can demonstrate compelling legitimate grounds that override your rights and freedoms or where processing is required for legal claims.

- **Right not to be subject to automated decision-making**
  You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects. We do not carry out such automated decision-making in our recruitment processes.
- **Right to lodge a complaint**
  You have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) if you believe that your personal data has been processed in violation of applicable data protection laws.
- **Right not to provide consent**
  You are not required to provide consent for any consent-based processing activities. Refusing to provide consent will not negatively affect the assessment or outcome of your application. You may also request that your application is reviewed exclusively by human personnel.

If you wish to exercise any of these rights, please contact us at talent@getpliant.com.