

Fidostra Career Site and Applicant Privacy Notice

United Kingdom and European Union

Last updated: 23 August 2026

1. Purpose and scope of this notice

This Applicant Privacy Notice explains how Fidostra collects, uses, stores and shares personal information relating to candidates and prospective members of staff.

It applies whether you:

- apply for a position through the Fidostra website;
- submit an application by email;
- apply through LinkedIn, a job board, university platform or recruitment agency;
- are referred to Fidostra by another person;
- submit a speculative application; or
- are contacted directly by Fidostra regarding a potential opportunity.

This notice applies to prospective employees, workers and, where relevant, contractors. The general Fidostra Website Privacy Notice continues to apply to your use of the Fidostra website.

If you join Fidostra, the processing of your personal information will subsequently be governed by the applicable employee or staff privacy documentation.

2. Who is responsible for your personal information?

The entity responsible for processing your personal information depends on the position for which you are being considered.

Positions based in Germany

Fidostra GmbH

Friedrich-Ebert-Anlage 36
60325 Frankfurt am Main
Germany

Commercial Register: Amtsgericht Frankfurt am Main, HRB 141902

Positions based in the United Kingdom

Fidostra UK Limited

Ludgate House
107-111 Fleet Street
London EC4A 2AB
United Kingdom

Company number: 17025662

The relevant job posting or recruitment communication will normally identify the recruiting entity.

If you submit a speculative application without specifying a location, Fidostra may initially review your application to determine which entity and position may be relevant. Once a recruitment process

begins, the entity responsible for that position will be the primary controller of your personal information.

Where both Fidostra entities consider you for separate positions, each entity may process your information as an independent controller for its respective recruitment activities.

References in this notice to “Fidostra”, “we”, “us” or “our” mean the relevant Fidostra entity or entities involved in the recruitment process.

3. Data Protection Contact

If you have any questions about this Applicant Privacy Notice, wish to exercise your data protection rights or raise a data protection complaint, please contact us at:

legal@fidostra.com

We will acknowledge data protection complaints within 30 days and take appropriate steps to investigate and respond without undue delay.

4. Personal information we may collect

We may collect and process the following categories of personal information where relevant to your application:

Identity and contact information

- name and title;
- postal address;
- email address;
- telephone number;
- nationality, immigration status and right-to-work information where required;
- copies or details of identity and right-to-work documents where legally necessary.

Application and professional information

- curriculum vitae and cover letter;
- employment history;
- education, qualifications and professional memberships;
- professional skills, experience and language capabilities;
- references and referee contact details;
- availability, preferred working arrangements and notice period;
- the position and Job ID for which you applied;
- information contained in correspondence with you.

Recruitment and assessment information

- interview notes;

- assessments of your experience and suitability;
- records of recruitment decisions;
- information provided during meetings, telephone calls or video interviews;
- documentation relating to an employment offer or proposed engagement.

Verification and screening information

Where relevant, proportionate and legally permitted, we may process:

- identity and right-to-work verification results;
- employment and education verification;
- professional qualification checks;
- reference responses;
- sanctions, fraud prevention or other appropriate screening results;
- criminal record or credit-related information where specifically justified by the role and permitted by applicable law.

Verification and screening will normally be undertaken only at an appropriate stage of the recruitment process. The checks performed may differ according to the position, location and level of responsibility.

Special category information

We may process limited special category personal information where necessary and legally permitted, including:

- health or disability information required to make adjustments during the recruitment process;
- information that may reveal racial or ethnic origin, religious beliefs or other protected characteristics if you voluntarily include it in your application;
- other sensitive information required to meet employment-law obligations or establish, exercise or defend legal claims.

Please do not provide sensitive personal information that is not relevant to your application.

5. Where we obtain your information

We may obtain personal information:

- directly from you;
- from recruitment agencies, professional advisers or individuals who refer you;
- from professional networking platforms such as LinkedIn;
- from job boards or university recruitment platforms;
- from referees and previous employers;
- from educational or professional institutions;
- from identity, right-to-work and background-screening providers;

- from publicly available professional or corporate sources, where relevant and proportionate.

If we obtain your personal information from another source, we will provide or make this notice available to you within the period required by applicable law.

6. Why we process your information

We may process your personal information for the following purposes:

- receiving and administering your application;
- communicating with you about your application;
- assessing your qualifications, experience and suitability;
- arranging and conducting interviews and assessments;
- verifying information provided by you;
- obtaining references at an appropriate stage;
- determining appropriate terms for a potential engagement;
- preparing and issuing an offer or employment documentation;
- conducting legally required or role-appropriate checks;
- confirming your right to work;
- making reasonable adjustments during the recruitment process;
- preventing fraud, protecting confidential information and maintaining security;
- maintaining appropriate recruitment records;
- establishing, exercising or defending legal claims;
- complying with legal, regulatory and reporting obligations.

We will not use your application information for unrelated marketing purposes.

7. Legal bases for processing

The legal basis we rely upon depends on the purpose and circumstances of the processing.

Steps before entering into a contract

We process information where necessary to take steps at your request before entering into an employment contract or other engagement.

This includes receiving your application, assessing your suitability, conducting interviews and preparing a potential offer.

The relevant basis is Article 6(1)(b) of the EU GDPR or UK GDPR. For recruitment by Fidostra GmbH, Section 26 of the German Federal Data Protection Act may also apply to the extent applicable.

Compliance with legal obligations

We process information where necessary to comply with legal obligations, including employment, immigration, right-to-work, equality and regulatory requirements.

The relevant basis is Article 6(1)(c) of the EU GDPR or UK GDPR and applicable national law.

Legitimate interests

We may process information where necessary for our legitimate interests, provided those interests are not overridden by your rights and interests.

These interests include:

- operating an effective and proportionate recruitment process;
- verifying information relevant to a position;
- maintaining appropriate recruitment records;
- protecting Fidostra, its clients, personnel, systems and confidential information;
- preventing and detecting fraud or misconduct;
- managing and defending legal claims.

The relevant basis is Article 6(1)(f) of the EU GDPR or UK GDPR.

Consent

We may ask for your consent where processing is genuinely optional, such as retaining your application for consideration for future positions beyond the normal retention period.

You may withdraw your consent at any time. Withdrawal does not affect processing carried out lawfully before the withdrawal.

Submitting an application does not constitute consent to processing for purposes that are not necessary for recruitment or otherwise permitted by law.

Special category and criminal offence information

Where we process special category information, we will identify both an Article 6 legal basis and an additional condition under Article 9 of the EU GDPR or UK GDPR.

Depending on the circumstances, this may include processing necessary for:

- employment and social protection obligations;
- making recruitment adjustments;
- establishing, exercising or defending legal claims; or
- processing based on explicit consent where appropriate.

Applicable provisions may include Article 9(2)(b) or Article 9(2)(f), the UK Data Protection Act 2018 and, for Germany, Section 26(3) of the German Federal Data Protection Act.

Criminal offence information will only be processed where relevant, proportionate and authorised by applicable law, including Article 10 of the EU GDPR or UK GDPR and applicable national legislation.

8. Automated decision-making

Fidostra does not currently use solely automated decision-making, including artificial intelligence-based decision-making, to determine whether a candidate should be offered employment or rejected.

Recruitment decisions are made by individuals involved in the relevant recruitment process.

If this changes materially, we will update this notice before using such technology in a way that affects candidates.

9. Who may receive your information?

Access to applicant information is limited to persons who require it for legitimate recruitment or related purposes.

We may share relevant information with:

- directors, managers and personnel involved in recruitment;
- other Fidostra entities where their involvement is necessary;
- information technology, email, hosting and cloud service providers;
- recruitment agencies and job-platform providers;
- identity, right-to-work and background-screening providers;
- referees, previous employers and educational or professional institutions;
- legal, tax, payroll, HR or other professional advisers;
- public authorities, regulators, courts or law-enforcement bodies where required by law;
- another organisation in connection with a proposed corporate transaction, subject to appropriate confidentiality and legal safeguards.

Service providers acting on our behalf are required to process personal information only for authorised purposes and to apply appropriate confidentiality and security measures.

We do not sell applicant personal information.

10. International transfers

Fidostra operates through entities in Germany and the United Kingdom. Applicant information may therefore be accessed or transferred between the United Kingdom and the European Economic Area where this is necessary for recruitment.

Such transfers are made in reliance on applicable adequacy arrangements or another legally recognised transfer mechanism.

Some service providers may process personal information in countries outside the United Kingdom or European Economic Area. Where a restricted international transfer takes place, we will use an appropriate legal mechanism, which may include:

- an applicable adequacy decision or regulation;
- approved standard contractual clauses;
- the UK International Data Transfer Agreement or UK Addendum; or
- another safeguard permitted by applicable data protection law.

Further information about relevant transfer safeguards may be requested through legal@fidostra.com.

11. How we protect your information

We use appropriate technical and organisational measures designed to protect applicant information against:

- unauthorised access;
- unlawful use or disclosure;
- accidental loss;
- alteration;
- destruction.

Access is restricted according to business need and the responsibilities of the persons involved in recruitment. Personnel and service providers with access to applicant information are subject to appropriate confidentiality obligations.

No method of electronic storage or transmission can be guaranteed to be completely secure. We nevertheless apply measures proportionate to the nature and sensitivity of the information processed.

12. How long we retain your information

If your application is unsuccessful, we will normally retain the principal recruitment record for up to **six months** after the recruitment process for the relevant position has concluded.

We may retain limited information for longer where necessary to:

- comply with a legal obligation;
- establish, exercise or defend legal claims;
- investigate a complaint or dispute;
- maintain a record that a particular check was completed;
- respond to a request from a regulator or authority.

Information obtained through right-to-work, identity or background vetting will not be retained for longer than necessary. Where appropriate, we may retain confirmation that a check was completed and its outcome rather than the underlying documents or reports.

If we wish to retain your application for consideration for future opportunities beyond the normal retention period, we will inform you and, where required, request your consent. You may withdraw that consent at any time.

If you join Fidostra, relevant recruitment information will become part of your employment record and will be retained in accordance with the applicable employee privacy documentation and retention requirements.

Information that is no longer required will be securely deleted or anonymised.

13. Information you are required to provide

You are not legally required to submit an application to Fidostra.

However, certain information is necessary for us to assess your application and conduct the recruitment process. If you do not provide information that is reasonably required, we may be unable to consider your application or proceed with an employment offer.

Where providing information is optional, we will seek to make this clear.

You are responsible for ensuring that the information you provide is accurate and not misleading. Please inform us if relevant information changes during the recruitment process.

14. Your data protection rights

Subject to applicable law and any relevant exemptions, you may have the right to:

- request access to your personal information;
- request correction of inaccurate or incomplete information;
- request erasure of your information;
- request restriction of processing;
- object to processing based on legitimate interests;
- receive certain information in a portable format;
- withdraw consent where processing is based on consent;
- request information about international transfer safeguards;
- not be subject to a decision based solely on automated processing that produces legal or similarly significant effects.

Not every right applies in every circumstance.

To exercise your rights, contact legal@fidostra.com. We may request information necessary to verify your identity before responding. We will respond within the period required by applicable law.

15. Complaints

You may raise a concern or complaint directly with Fidostra by contacting:

legal@fidostra.com

You also have the right to complain to the data protection authority responsible for the relevant Fidostra entity.

Germany

Hessischer Beauftragter für Datenschutz und Informationsfreiheit
<https://datenschutz.hessen.de/>

United Kingdom

Information Commissioner's Office
<https://ico.org.uk/make-a-complaint/>

You may also have the right to complain to another competent supervisory authority in the country where you live or work or where you believe an infringement occurred.

16. Changes to this notice

We may update this Applicant Privacy Notice to reflect changes in law, regulatory guidance, our recruitment practices or the service providers and systems we use.

The current version will be made available on the Fidostra website. Where a change materially affects an ongoing recruitment process, we will take appropriate steps to bring it to the attention of affected candidates.

17. Related privacy information

This notice relates specifically to recruitment and applicant information.

For information about the operation of the Fidostra website, hosting, cookies and general website communications, please see the separate **Fidostra Website Privacy Notice** available at:

<https://www.fidostra.com/privacy/>