

## Kanopi Ltd – Privacy Notice for Applicants and Employees

(EU GDPR and UK GDPR Compliant)

Kanopi Ltd (“we”, “our”, “us”) is committed to protecting the privacy and security of personal information relating to job applicants and employees. This notice explains how we collect, use, store, share, and safeguard personal data during recruitment and throughout and after employment or engagement. It applies to all applicants, candidates, employees, and contractors of Kanopi Ltd.

This notice is provided in accordance with the UK General Data Protection Regulation (UK GDPR), the EU General Data Protection Regulation (EU GDPR), and applicable data protection laws..

### 1. Data Controller

Kanopi Ltd is the data controller for your personal data.

Registered office: 54 Bloomfield Avenue, Unit 748, Moat House, Belfast, BT5 5AD

Contact for data protection matters: Romy Bundy (DPO), [romy@kanopicover.com](mailto:romy@kanopicover.com)

For EU-based applicants or individuals, Kanopi Ltd works jointly with its Australian parent company, Expense Check Pty Ltd (Kanopi Cover), which may act as a controller for recruitment and HR processing.



## Part A: Applicant Privacy Notice

### 2. What Applicant Data We Collect

During recruitment we collect, store, and use the following categories of personal data:

- Identification and contact details
- CVs, cover letters, qualifications, work history
- Interview notes, assessment results, written or technical tests
- Right-to-work documentation (if required)
- Reference information (where provided by you or your referees)
- Background check results (if applicable and only where legally permitted)
- Communications between you and hiring managers or recruiters
- Any additional information you choose to provide during the hiring process

Special category data (such as health information or diversity data) is only processed where necessary and permitted by law.

### 3. How We Use Applicant Data

We use applicant data to:

- Manage and administer the recruitment and selection process
- Assess suitability for the role
- Verify qualifications, experience, and right to work
- Communicate with you about the process
- Keep records of our recruitment decisions
- Maintain security and prevent fraud
- Comply with legal or regulatory requirements

### 4. Lawful Bases for Processing Applicant Data

We process applicant data under the following lawful bases:

- Legitimate interests (recruitment and selection, assessing suitability)
- Legal obligation (right-to-work checks, regulatory requirements)
- Contractual steps prior to entering into an employment contract
- Consent (only where explicitly obtained, for example to retain your CV for future opportunities)

### 5. Sharing Applicant Data

We may share applicant data with:

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- Recruitment platforms or applicant tracking systems
- Hiring managers and interviewers
- Referees (where you have provided details)
- Background-check providers (if used)
- Our group companies, including Kanopi's Australian parent entity, for internal hiring decisions
- Service providers such as email, communication, and file storage providers
- Regulators or authorities where required by law

All third parties must apply appropriate data protection measures.

## 6. International Transfers (Applicants)

Applicant data may be accessed or processed outside the UK/EEA, including by our Australian parent company and global service providers (such as Google Workspace, Slack, HubSpot, Xero, and Deel).

When this occurs, we use one or more of the following safeguards:

- UK Addendum to the EU Standard Contractual Clauses
- EU SCCs (Module 1 or 2, depending on the vendor)
- Supplementary technical and organisational measures such as encryption and role-based access

These safeguards ensure that your data remains protected to EU GDPR and UK GDPR standards.

## 7. Applicant Data Retention

If your application is unsuccessful, we retain your data for up to 12 months after the end of the recruitment process unless we are required to keep it for longer or you request deletion sooner.

If you provide consent for future opportunities, we may retain your data for a longer period for talent pooling purposes.

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## Part B: Employee Privacy Notice

### 8. What Information We Collect About Employees

We collect, store, and use the following categories of employee and contractor personal data:

- Identification and contact details
- Employment details (role, start date, contracts)
- Payroll and financial data
- Performance and conduct information
- Health and wellbeing information
- Technology and security data
- Special category data (processed only where necessary)

### 9. How We Use Employee Personal Information

We use your personal information to:

- Manage your employment relationship
- Administer payroll, benefits, and HR operations
- Manage performance, conduct, and training
- Support IT and security operations
- Maintain corporate governance and audit records
- Comply with legal and regulatory obligations
- Support internal reporting and group management functions
- Respond to requests or investigations from authorities

We only process personal data when we have a lawful basis (performance of contract, legal obligation, legitimate interests, or your consent for specific purposes).

### 10. Sharing Employee Data

We may share your data with:

- Payroll providers and benefits platforms
- HR and recruitment software providers
- IT and communication service providers (Google, Slack, etc.)
- Our Australian parent company for HR, management, and administrative purposes
- HMRC, pension authorities, insurers, auditors, regulators, or law enforcement
- Professional advisors (legal, tax, accounting)

All third parties must apply appropriate data protection measures.

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The recipients listed above include entities outside the UK/EEA. International transfers are safeguarded using EU Standard Contractual Clauses (SCCs) together with the UK Addendum, plus appropriate technical measures such as encryption and access controls.

## 11. International Transfers (Employees)

Where possible, we store data within the UK or EEA. However, some employee data is accessed or stored outside these areas, including by:

- The Australian parent entity (HR administration, management, reporting)
- Global SaaS providers such as Google Workspace, Slack, Xero, Deel, Employment Hero, HubSpot, and ClickUp

All such transfers are protected by:

- EU Standard Contractual Clauses (Module 1 or 2, depending on context)
- UK Addendum
- Encryption and role-based access
- Internal confidentiality and security obligations applicable to all staff

This ensures an equivalent level of protection in accordance with EU GDPR and UK GDPR.

## 12. Data Retention

We retain employee personal data only as long as necessary for employment and legal purposes. Typical retention periods include:

- Employment and payroll records retained for seven years after employment ends
- Health and safety data retained according to statutory limits
- IT security logs retained according to our ISMS and operational needs

Retention periods may vary depending on legal or regulatory requirements.

## General Information (Applies to both Applicants and Employees)

### 13. Data Security

We use technical and organisational measures to protect your personal data, including encryption, multi-factor authentication, role-based access controls, audit logging, secure configuration, and an ISO27001-aligned Information Security Management System (ISMS).

Access is limited to staff who have a legitimate business need to know.

### 14. Your Rights

Under the UK GDPR and EU GDPR, you have the right to:

- Access your personal data
- Correct or update inaccurate information
- Request erasure in certain circumstances
- Restrict or object to processing
- Request data portability
- Withdraw consent where consent is the lawful basis
- Lodge a complaint with a supervisory authority

If you are based in the UK, you can complain to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

If you are based in the EU, you may complain to your local data protection authority.

To exercise any of your rights, contact: [romy@kanopicover.com](mailto:romy@kanopicover.com).

### 15. Changes to This Notice

We may update this notice periodically. The current version will be available on our HR system or on request.

### 16. Contact Details

For questions about this notice or your data protection rights, contact:

Romy Bundy (Data Protection Officer)

Email: [romy@kanopicover.com](mailto:romy@kanopicover.com)

