
Global Applicant Privacy Notice

1. Introduction

Like most businesses, Bridgepoint holds and processes a wide range of information, some of which relates to individuals who are applying to work for Bridgepoint.

This Global Applicant Privacy Notice (the “Notice”) explains:

- what personal data Bridgepoint holds and why Bridgepoint processes it;
- the legal grounds which allow Bridgepoint to process your personal data;
- where the data comes from, who gets to see it and how long Bridgepoint keeps it;
- how to access your personal data and other rights;
- who to contact for further information.

Please note generally that at all times Bridgepoint will endeavour to comply with all applicable local laws in your particular jurisdiction in relation to data processing.

We have a separate Global Staff Privacy Notice that applies to our current and former employees.

2. Scope

This Notice applies to individuals who apply to work for Bridgepoint.

References in this Notice to:

- “Bridgepoint” means Bridgepoint Group plc with company registration number 11443992 and its affiliates. A full list of the members of the Bridgepoint group can be found under the “Contact and Locations” section of our website here: <https://www.bridgepoint.eu/about-us>.
- “employment”, “work” (and similar expressions) include any arrangement Bridgepoint may have under which an individual provides Bridgepoint with work or services, or applies for such work or services. By way of example, when Bridgepoint mentions an “employment contract”, that includes a contract under which you may in future provide Bridgepoint with services and references to ending your potential employment includes terminating a contract for services.
- “you” includes anyone within the scope of this Notice.

3. What does Bridgepoint mean by “Personal Data” and “Processing”?

“Personal data” means any information relating to an identified or identifiable natural person. An identifiable natural person is someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. It includes not only facts about an individual, but also intentions and opinions about an individual. Examples of personal data range from IP addresses to performance evaluations.

Data “processed automatically” includes information held on, or relating to use of, a computer,

laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV or photographs.

"Processing" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership, genetic and biometric data.

4. What Personal Data Bridgepoint holds and why it processes it

Bridgepoint processes personal data for the purposes of its business including recruitment, management, administrative, employment and legal purposes.

The Annex to this Notice provides more specific information on these purposes, on the type of personal data that may be processed and on the grounds on which Bridgepoint processes such data.

5. Where the Personal Data comes from

When you apply to work for Bridgepoint the initial data about you that Bridgepoint processes is likely to come from you, for example, contact details, bank details and information on your immigration status and whether you can lawfully work. Where necessary and in accordance with this Notice, Bridgepoint will require references and information to carry out background checks. If Bridgepoint requires references as part of the process, these will be obtained on a confidential basis. If you have concerns about this in a particular context, you should speak to your recruiter or contact us using the details in the "Contact details" section.

Please note Bridgepoint may also receive data from third party recruiters, agents and similar organisations as a part of the recruitment process.

6. Who gets to see your Personal Data?

- Internal Use

Where necessary and as set out in this Notice, your personal data will be disclosed to relevant managers, HR and administrators for the purposes of your application as mentioned in this document. Bridgepoint will also disclose this to other members of the Bridgepoint group where necessary for decision making regarding your application and this will depend on the type of role you are applying for.

- External Use

Bridgepoint will only disclose your personal data outside the Bridgepoint group if disclosure is consistent with a ground for processing on which Bridgepoint relies and doing so is lawful and fair. Bridgepoint will disclose your personal data if it is necessary for Bridgepoint's legitimate interests as an organisation or the interests of a third party (but Bridgepoint will not do this if these interests are over-riden by your interests and rights, in particular to privacy). Where necessary, Bridgepoint will also disclose your personal data where Bridgepoint is required to do so by law, or in connection with criminal or regulatory investigations or where you consent.

Specific circumstances in which your personal data may be disclosed include:

- to organisations that process data on Bridgepoint's behalf such as Bridgepoint's payroll service, insurers and other benefit providers, Bridgepoint's bank and organisations that host its IT systems and data. This would normally occur if you accept an offer from Bridgepoint and would be carried out as part of the on-boarding process;
- to third party recruitment consultants and similar businesses (including online recruitment portals) as a part of the recruitment process; and
- disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request, a regulatory requirement, or to Bridgepoint's investors as part of mandatory reporting.

7. Transfers of Personal Data

Bridgepoint is headquartered in the UK. In connection with Bridgepoint's business and for recruitment, administrative, management, legal and regulatory purposes, Bridgepoint will, where necessary and as set out in this Notice, transfer your personal data outside the UK and/or the EEA to members of the Bridgepoint group and on to third party service providers, vendors and other third parties (e.g. regulators), which can in principle be located in any country in the world. Bridgepoint has its material operations in the UK but many third-party service providers that Bridgepoint works with are based globally. As such, your personal data may be transferred (both within the Bridgepoint group as well as to third parties) to the EEA, the United States and any other countries in the world, as required, but will be always subject to the safeguards required by applicable data protection laws, including, without limitation, those set out in this Section 7. Your personal data may also be shared with other members of the Bridgepoint group, on a less frequent basis, and you can find the location of the members of the Bridgepoint group here: <https://www.bridgepoint.eu/about-us>. Bridgepoint will endeavour to ensure that any such transfer is lawful and subject to appropriate security arrangements.

Wherever personal data is transferred to a member of the Bridgepoint group outside of the UK, and/or the EEA:

- the recipient will act as a data controller; and
- the members of the Bridgepoint group have entered into an intra-group data sharing agreement ensuring appropriate and suitable safeguards with Bridgepoint controllers/processors outside the UK, and/or the EEA. These are in standard terms approved by the UK Secretary of State or the European Commission. For further details please contact us using the details in the "Contact details" section.

Wherever personal data is transferred to third parties outside of the UK or the EEA, Bridgepoint will utilise any necessary and appropriate safeguards including:

- the EU-US Data Privacy Framework (as well as the UK Extension to the EU-US Data Privacy Framework and any analogous frameworks or certification schemes adopted by the applicable governmental or regulatory body under applicable law);

- standard terms approved by the UK Secretary of State, the European Commission; or
- on occasion, where relevant and permissible, derogations under Article 49 of the General Data Protection Regulation (“GDPR”) or equivalent provision under applicable law (including the UK GDPR). In general, Bridgepoint does not rely on such derogations but may do so where there is a clear lawful basis (e.g. transfers of personal data in response to SEC documents and records requests made under the Article 49(1)(d) derogation as they are in the public interest).

8. How long does Bridgepoint retain your Personal Data?

Although there is no specific period for which Bridgepoint will keep your personal data, Bridgepoint will not keep it for longer than is necessary for Bridgepoint’s purposes, including compliance with all legal and regulatory obligations applicable to Bridgepoint.

In general, Bridgepoint will keep your personal data for the duration of your employment and for a period afterwards. In considering how long to keep it, Bridgepoint will take into account its relevance to Bridgepoint’s business and your employment either as a record or in the event of a regulatory enquiry or legal claim.

If your data is only useful for a short period (for example, CCTV footage data) Bridgepoint will delete it.

Personal data relating to job applicants (other than the person who is successful) will be deleted in accordance with our global retention periods for applicants.

9. Access to your Personal Data and other rights

If you would like specific information in relation to the processing of your personal data, please contact us using the details in the “Contact details” section.

You have a legal right to make a “subject access request” for information about the personal data that Bridgepoint holds and processes about you and the reason for such processing.

You may also have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided Bridgepoint with data about yourself (for example your address or bank details), you have the right to be given the data in machine-readable format for transmitting to another data controller.

This only applies if the ground for processing is Consent or Contract (as defined in the Annex).

If Bridgepoint has relied on Consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what Bridgepoint has done before you withdraw consent.

Although Bridgepoint does not use any automated decision making as part of any recruitment process (see below for more information) applicants may request information about the use of AI tools involved in the assessment of their application and may ask for human review of any decision materially affected by such tools.

10. AI, automated decision-making and profiling

Automated decision-making is the process of making a decision by automated means without any human involvement. Profiling is a form of automated processing of personal data to evaluate certain aspects of an individual's personality, behaviour, interests and habits to make predictions or decisions about them. Artificial Intelligence ("AI") is a broad term used for a range of technologies that mimic human thought to solve complex tasks.

Bridgepoint may use AI tools within its applicant tracking system to assist with the screening and ranking of applicants based on their skills, qualifications and experience. While Bridgepoint uses such tools as a recruitment aid, all applications undergo a human review by members of the recruitment team and, as such, Bridgepoint ensures that applicants will not be subject to a decision made on solely automated decision-making.

Bridgepoint may share data processed in the AI tool internally with other members of the recruitment team. Bridgepoint will retain the data processed by the AI tool for as long as applicants wish to be considered for vacancies and in accordance with our global retention periods for applicants, after which the information will be securely deleted.

You may request information about the use of AI tools that may be involved in the assessment of your application. Please see the FAQs on page 13 of this document for further information regarding the use of AI in our recruitment processes.

11. Complaints

If you have complaints relating to Bridgepoint's processing of your personal data, you should first raise these with us using the details in the "Contact details" section.

If you are not satisfied with our response or if you prefer to go directly to the statutory regulator, you can contact the relevant data protection authority in your jurisdiction or at the place of the alleged infringement. The contact details for the statutory regulatory authorities responsible for data protection are as follows:

- UK: Information Commissioners Office at <https://ico.org.uk/>.
- EU: You can find a list of contact details for all EU supervisory authorities at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.
- Rest of World: Your supervisory authority will be the data protection regulator of the country in which you are employed by Bridgepoint or at the place of the alleged infringement.

12. Contact details

Please note that generally the data controller of your personal data will be the employing/engaging entity that you apply to work for but also other members of the Bridgepoint group with which Bridgepoint shares data for business administration purposes.

Please contact careers@bridgepoint.eu with any questions.

13. Status of this notice

This Notice does not form part of any contract of employment you might enter into and does not create contractual rights or obligations. From time to time the Notice will be updated to

reflect changes to Bridgepoint’s business operations or changes to the laws and regulations to which Bridgepoint is subject. Nothing in this Notice is intended to create an employment relationship between Bridgepoint and any non-employee.

14. Document governance

Version	v1.0
Privacy Notice Owner	Legal and Compliance Team
Date last reviewed	January 2026

Annex – Additional information about processing

- A. **What are the grounds for processing?** Under data protection law, there are various grounds on which Bridgepoint can rely when processing your personal data. In some contexts, more than one ground applies. Bridgepoint has summarised these grounds as Contract, Legal Obligation, Legitimate Interests and Consent and has outlined what those terms mean in the following table.

Term	Ground for processing	Explanation
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out Bridgepoint's contractual duties and exercising Bridgepoint's contractual rights.
Legal Obligation	Processing necessary to comply with Bridgepoint's legal and regulatory obligations	Ensuring Bridgepoint performs its legal and regulatory obligations. For example, providing a safe place of work, avoiding unlawful discrimination and complying with rules of a relevant regulatory authority.
Legitimate Interests	Processing necessary for Bridgepoint's or a third party's legitimate interests	<p>Bridgepoint or a third party has legitimate interests in carrying on, managing and administering Bridgepoint's respective businesses effectively and properly and processing your data in connection with those interests.</p> <p>Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.</p>
Consent	You have given specific consent to processing your data	In general, processing of your data in connection with employment is not conditional on your consent. However, there may be occasions where Bridgepoint does specific things (for example providing a reference) and may rely on your consent to Bridgepoint's doing so.

Substantial Public Interest	The processing is necessary for reasons of substantial public interest	Where permitted by law and where the processing is proportionate to the aims being pursued, Bridgepoint may rely on a substantial public
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B. Processing sensitive Personal Data

Sensitive personal data includes the following:

- health information;
- information about any disability, need for mobility assistance or health conditions which we may become aware of;
- information related to your ethnicity or sexual orientation;
- information relating to your religious beliefs;
- information relating to a criminal offence;
- information relating to social mobility and social background (for example education background, schools attended and family university history); and
- any other sensitive personal data which you may provide to Bridgepoint from time-to-time.

If Bridgepoint processes sensitive personal data about you, as well as seeking to ensure that one of the grounds for processing mentioned above applies, Bridgepoint will endeavour to make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include processing:

- being necessary for the purposes of your or Bridgepoint’s obligations and rights in relation to employment in so far as it is authorised by law or collective agreement, (e.g. for any adjustments to the recruitment process or future working arrangements);
- for reasons of substantial public interest (e.g. equality and diversity purposes, in particular, to advance Bridgepoint’s diversity and inclusion initiatives and to maintain diversity at a company-wide level);
- being necessary for the purpose of establishing, making or defending legal claims;
- for the purposes of preventing or detecting unlawful acts and complying with our regulatory obligations;
- in order to protect your vital interests;
- with your consent. Where we rely on your consent to process sensitive personal data, you have the right to withdraw your consent at any time though, if you do so, that will not affect the lawfulness of what Bridgepoint has done before you withdraw consent.

C. Further information on the data Bridgepoint processes and Bridgepoint purposes

The above information in the Notice outlines some of the purposes for which Bridgepoint processes your personal data. More specific information on these, examples of the data and the grounds on which Bridgepoint processes personal data are in the table below.

The examples in the table cannot, of course, be exhaustive however Bridgepoint will

endeavour to keep this table updated about its processing activities. Where legally required or where there is a legitimate interest in doing so, Bridgepoint will require criminal background checks to be conducted prior to offering any roles within the business.

Where Bridgepoint relies on legitimate interests, we have set out above the purposes for processing such data and why such processing is necessary. This Notice sets out the steps that Bridgepoint takes to keep your data safe and, as such, Bridgepoint has adequately balanced your data subject rights, with the needs of the business to process this data. This Notice also serves as a part of Bridgepoint’s legitimate interests assessment.

Purpose	Examples of personal data that may be processed	Grounds for processing
<p>Recruitment including the following reasons:</p> <ol style="list-style-type: none"> 1. Evaluating your experience and qualifications against the requirements of the position you are applying for. 2. Communicating with you in respect of any meetings, interviews or offer of employment we choose to make and providing you with information about our onboarding process. 3. Administering our recruitment process and online careers portal. 	<p>Standard data related to your identity (e.g. your name, address, email address, ID information and documents), telephone numbers, place of birth, nationality, contact details, professional experience and education (e.g. university degrees, academic records, professional licenses, memberships and certifications, awards and achievements, and current and previous employment details), results of any online assessments, financial information (including current salary information) language skills, emergency contact details, and any other personal data that you present Bridgepoint with as part of your application related to the fulfilment of the role.</p> <p>An AI screening score may be used to assist in the evaluation of applicants’ skills and experience against the requirements of the role.</p> <p>Information concerning your application and Bridgepoint’s assessment of it, your references, any checks Bridgepoint may make to verify information provided or background checks (where permitted by law) and any information connected with your right to work (including any assessment of any regulatory requirement to be fit and proper (or similar) for a particular regulated position within Bridgepoint). This may include as necessary for your role (and subject to legislation in your jurisdiction) checks verifying your job history, qualifications and previous remuneration as well as credit and</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests: carry out informed recruitment decisions and the ability to effectively administer the recruitment process</p>

	<p>criminal record checks.</p> <p>If necessary, Bridgepoint will also process information concerning your health, any disability and in connection with any adjustments to working arrangements.</p> <p>Recruitment in relation to any role for which you apply and/or any role we think you may be suitable for in the future.</p>	
Advertising, marketing and promotional activities	<p>Your name and contact details may be used for advertising, marketing and promotional purposes when you join the Bridgepoint talent community.</p> <p>If you have expressed an interest in hearing from us, we may send you information about open positions that we think match your interests and experience.</p>	<p>Consent</p> <p>Legitimate Interest: to support Bridgepoint's advertising, marketing and promotional activities.</p>
Background screening and criminal record checks as a part of financial regulatory compliance and for the prevention of crime	<p>Names, contact details, personal data relating to criminal convictions and offences (and any further personal data Bridgepoint is required to provide to regulators). Where personal data is being processed for the purposes of background screening, you will be asked to upload the relevant personal data onto Bridgepoint's vetting platform.</p>	<p>Legal Obligation (where any screening and criminal record checks are required by a regulator for instance)</p> <p>In other cases, conducting a criminal background check may be necessary for reasons of Substantial Public Interest</p>
Entering into a contract with you (if you are made an offer by us)	<p>Information on your terms of employment from time to time including your hours and working patterns and your pay and benefits such as your participation in pension arrangements, life and medical insurance; and any Employee Incentive Plans or anything to do with any remuneration scheme.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests: to have an accurate record of your employment contract for its performance and variation</p>
Contacting you or others on your behalf	<p>Your address and phone number, emergency contact information and information on your next of kin.</p>	<p>Contract</p> <p>Legitimate interests: the ability to contact you, or others on your behalf, in an emergency</p>

<p>Payroll administration</p>	<p>Information on your bank account, pension contributions and on tax and national insurance.</p> <p>Your national insurance number or other government issued identifier.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests: the ability to carry out payroll, general HR and business administration in an efficient manner, and to plan around your absence where necessary</p>
<p>Financial planning and budgeting</p>	<p>Information such as your proposed salary and (if applicable) envisaged bonus levels.</p>	<p>Legitimate interests: the ability to carry out effective financial planning and budgeting for our business</p>
<p>Physical and system security</p>	<p>CCTV images upon attendance for interview at our premises.</p>	<p>Legal obligation</p> <p>Legitimate interests: the ability to keep our locations and systems secure, provide a safe environment for our personnel</p>
<p>Providing information to third parties in connection with the transactions and services that Bridgepoint contemplates or carries out</p>	<p>Information about your contract and other employment data that may be required by a party to a transaction such as a prospective purchaser, seller, trading counterparty, service provider, vendor or outsourcer.</p>	<p>Legitimate Interests: to provide information to third parties in connection with transactions and services related to our business that we contemplate or carry out</p> <p>Contract</p> <p>Legal Obligation</p> <p>Consent</p> <p>Substantial Public Interest</p>
<p>Equality and diversity monitoring and related initiatives (in compliance with applicable local laws in your particular jurisdiction)</p>	<p>Information about your nationality, race, ethnicity, gender, sexual orientation, age, citizenship, military status and any disabilities as part of diversity monitoring activities. Such data will be aggregated and used for equality of opportunity monitoring purposes. Please note we may share aggregated and anonymised diversity statistics with regulators if formally required / requested.</p>	<p>Legitimate interests: to ensure the equality of opportunity and treatment of employees</p> <p>Article 9(2) GDPR condition: processing is necessary for reasons of Substantial Public Interest</p>

<p>Disputes and legal or regulatory matters or proceedings</p>	<p>Any information relevant or potentially relevant to a dispute or legal or regulatory matter or proceeding affecting us.</p>	<p>Contract Legal Obligation Legitimate Interests: the ability to respond to and defend against legal claims</p>
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Candidate FAQ: How Bridgepoint Uses AI in Recruitment

Bridgepoint – Use of AI in Recruitment: Candidate FAQ

1. Does Bridgepoint use AI in its recruitment process?

Yes. Bridgepoint uses an AI-supported tool within our applicant tracking system to help our recruitment team screen and organise applications more efficiently.

2. What does the AI tool actually do?

The tool reviews information you provide (such as your CV, skills and work history) and produces an *indicative match score* to help recruiters understand how closely your experience aligns to the role requirements.

3. Does the AI tool make decisions about my application?

No. The match score is only an aid.

Bridgepoint recruiters review every application and make all decisions themselves. You will *never* be rejected or progressed solely because of automated processing.

4. What data does the tool use?

Only the information you choose to provide as part of your application (e.g., CV, education, work history and skills). It does not use sensitive data such as ethnicity, health information or political views.

5. Who processes my data?

Your application is processed by Bridgepoint and our recruitment technology provider, SmartRecruiters. Their AI sub-provider receives only pseudonymised data (no names or contact details).

6. Can I request more information about how the AI tool affected my application? Yes. You can request:

- an explanation of how the tool was used in your assessment,
- your match score, and
- human review of any assessment.

7. Will my data be used to train AI models?

Only if allowed by Bridgepoint. We do not include candidate data in training activities without appropriate safeguards.

8. Who can I contact with questions or concerns?

Email: careers@bridgepoint.eu

For privacy questions: refer to the Applicant Privacy Notice or contact our Data Protection team.