



## Candidate privacy notice

### Who are we?

We are Monzo (Monzo Bank Holding Group, Monzo Bank Limited, Monzo Bank Europe Designated Activity Company), ("we", "our", "us") and operate under the name Monzo. This notice explains what personal information we collect when you enter into a hiring process at Monzo and how we use it. This notice explains what information we collect about you and how we use it when we receive an application from you, reach out to you about a role, or when your details are referred to us by agencies we work with or current Monzo employees.

Got a question about something in this notice, or want to contact our Data Protection Officer (DPO)? Please don't reach out via in-app chat - that's for account queries for our customers only. Instead, you can:

- Email us at [dpo@monzo.com](mailto:dpo@monzo.com)
- Write to us at:
  - **For Monzo Bank Limited (UK roles):** Monzo Bank Limited, Broadwalk House, 5 Appold Street, London EC2A 2AG
  - **For Monzo Bank Europe Designated Activity Company (EU roles):** Monzo, Unit 1, Floor 4, One Central Plaza, Dame Street, Dublin 2, D02 K7K5, Ireland

**For UK roles:** We're registered with the UK data protection authority (the Information Commissioner's Office or ICO) under number ZA108184.

The relevant data controller depends on the Monzo entity you are applying for a role with:

- For UK roles, the data controller is Monzo Bank Limited
- For EU roles, the data controller is Monzo Bank Europe Designated Activity Company.

# The information we collect about you

**When you apply for a job or let us know you're interested, we may ask for:**

- your name and contact details (like your address, phone number, and personal email address)
- the type of work you're looking for and your work and educational history (typically in your CV/resume)
- the country you're applying to work in and your right to work status in that country
- your responses to application questions and other information you give us through potential take-home tasks
- details of your current and/or desired salary and other things relating to compensation and benefits packages
- your current notice period.

We will only ask you to provide this information if we're allowed to under local law.

**If we invite you for an interview, we may collect:**

- details of your availability and any special requirements you want us to know about, so we can make reasonable adjustments for your interview
- any other information you give us, or observations we make through interviews, that are relevant to your application, including take home task submissions
- a form of identification, proof of address and current and previous addresses, and national identification numbers so that we can carry out background checks
- details about former managers or colleagues for us to contact as referees.

We'll also ask for the following 'special category' data:

- ethnicity
- gender identity
- sexual orientation
- disability & neurodiversity status.

Giving us special category data is completely voluntary, and the data will be aggregated and not visible to Monzo alongside your application. There's more information about how we'll use it below.

### Information we get from outside Monzo

We may also get your contact details and professional profile from:

- recruitment or executive search agencies
- professional networking sites or other public sources such as social media and job boards
- referrals made by Monzo staff who ask for your permission to be referred for a role.

If you're invited for an interview and are offered a position at Monzo we'll also collect:

- the results of your background checks from background check providers we work with. This may include information about criminal convictions if you have a record, publicly recorded financial information and your immigration status. If you are based in the UK and applying for a UK role, we will also check the details recorded on the Cifas database (if applicable)
- references from previous employers, managers or colleagues we contact to learn about you
- your home address for the purpose of recording your working location, sending you hardware or for any correspondence
- whether you are a current Monzo customer (for monitoring purposes and to check if you've previously misused any product or services offered)..

## How we use your information

The General Data Protection Regulation (GDPR, UK GDPR) says we need to have a legal basis for using your personal data. At least one of the following must apply:

- **Contractual duty:** This is when we need the information to process your application to enter into an employment (or other) contract with you
- **Legal duty:** This is when a law or regulation says we must collect the information to decide if we can enter into an employment (or other) contract with you

- **Legitimate interest:** This is when we need to use your data for our legitimate interests, or those of a third party. It means using data in a way that you expect us to, for a reason which is in your and/or our (or a third party's) interest and which doesn't override your privacy rights
- **Public interest:** This is when we need the information to perform a specific task in the public interest that's set out in law
- **Vital individual interest:** This is when we need to use your information to protect your life, and have no way of asking for your permission
- **We have your consent**

In this section we explain which one we rely on to use your data in a certain way.

**We need to use your data to enter into a contract with you, so we can:**

- contact you during the hiring process
- carry out right to work checks
- carry out background checks in all locations we're legally allowed to run them for employment purposes (unless you're being considered for a Senior Manager and/or Non Executive Director role, in which case some checks are mandatory by law)
- carry out fraud prevention checks via Cifas (if you are based in the UK)
- consider your suitability for a role you're applying for
- get references and vet information you give us in your CV
- send you the necessary hardware to carry out your new role (if your application is successful)

**We need to use your data to comply with the law, so we can:**

- make sure you have the right to work
- learn about your fitness and suitability for a regulated role, including running criminal background checks (where required by local regulation)

**We need to use your data when it's in our 'legitimate interest', so we can:**

- run our recruitment processes (including tools to track your application & interview process, schedule interviews, help us efficiently screen applications & take home tasks, send and sign documents and facilitate onboarding)
- share your contact details with our travel providers if you need to travel to an interview, stay at a hotel or relocate to work for Monzo

- share your details with partners who help us manage and deliver hardware orders
- share files with you via our file sharing platform (if we need to)

**We ask for your consent to use your data, so we can:**

- collect special category data relating to you (on a voluntary basis) to help with our diversity and inclusion monitoring. For more information on this, please see ***'How we use your 'special category' data' below.***

## **How we use your 'special category' data**

We may need to process sensitive information about job applicants that data protection laws call 'special category' data. This is information that can reveal a person's racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic or biometric data (if used for identification purposes) and data concerning a person's health, sex life or sexual orientation.

The GDPR says we need a second lawful basis to process 'special category' data in addition to contractual or legal duty, legitimate interest, public interest, vital individual interest or consent. This second lawful basis can be: explicit consent, exercising legal rights in the field of employment, protecting vital interests, establishing, defending or exercising legal claims or reasons of substantial public interest. We can also process special category data that candidates have chosen to share publicly. In this section we explain which lawful bases we rely on to use your 'special category' data in a certain way.

**Using the data is necessary for reasons of substantial public interest.**

If you answer our identity survey when you apply for a job with Monzo, we collect and use information you share about your sexuality, racial and ethnic origin and health with your consent and for reasons of substantial public interest. We need to use this information to make sure we give job applicants equal opportunity and treatment regardless of their demographic.

Responding to the survey is voluntary and won't affect your application in any way.

Once we've collected the data, we can only see it in an aggregated format in relation to the role you're applying for. It won't be connected to your application on our interface. We'll view the aggregated data for hiring pipelines retrospectively: the reports we run will always be one month behind, so usually your data won't be included in our reports while you're going through the process.

Greenhouse (the company that stores identity survey responses for us) keeps a copy that they can link to your application but this isn't viewable to Monzo. You can ask us to delete it at any time. To request this, please contact [hiring@monzo.com](mailto:hiring@monzo.com).

## How we use artificial intelligence

We may use artificial intelligence ('AI') to help us achieve the purposes for processing your personal data described in this notice. Examples of how we use AI include supporting the take home task scoring process for some roles (based on legitimate interest - we'll let you know if we're doing this), and to summarise interviews (based on legitimate interest - we'll let you know if we're doing this and won't if don't want us to).

## Who we share your data with

### Companies that help us recruit, and need to process your details.

This includes:

- recruitment or executive search agencies that help us with the recruitment process
- companies who run background and reference checks on our behalf
- fraud prevention communities
- recruitment software service providers, for the purpose of processing your application and onboarding, or scheduling your interviews
- companies who help us to streamline our hiring and onboarding process, for instance by supporting interview scheduling or onboarding
- cloud computing power, storage and software providers
- Monzo's travel partners if you need to travel to a job interview and/or stay at a hotel, or relocate to work for Monzo
- Monzo hardware suppliers, if your application is successful and we need to send you hardware for your role.

## References if your application is successful

- We reach out to the referees you've listed to learn more about you (we only share your name and where we're calling from).

## Public bodies

- We ask the relevant public services to check your criminal record, if this is legally necessary for the role
- In some circumstances, we may share your details with other parties. This is to comply with the law or to protect our rights, property or safety.

## Consultants and legal advisors

- We may share your details with consultants and legal advisors if this is necessary to resolve an issue or get advice on your suitability for a role.

## Cifas (fraud prevention community)

If you are offered a UK based role with Monzo Bank Limited, we will kick off background checks with our screening partner and the personal information you have shared with us during the hiring process will be shared with Cifas as part of our background check process. Cifas will use this information to prevent fraud, other unlawful or dishonest conduct, malpractice and other seriously improper conduct. If any of these are detected you could be refused certain services or employment, and your offer with Monzo may be withdrawn. Your personal information will also be used to verify your identity. More details about how your information will be used by us and Cifas, and your data protection rights, can be found at <https://www.cifas.org.uk/fpn>. If you have any questions about this, please email [insider-fraud@monzo.com](mailto:insider-fraud@monzo.com).

If you are applying for an EU-based role, or live in the EU, we may carry out country-specific fraud checks to the extent that this is allowed by local law.

## How long we keep your data

If your application is unsuccessful, we keep it for 2 years after we close the hiring process, unless you request that we delete it sooner. We need to keep a copy of all applications for 6 months (or longer where needed by local law) in case we face a legal challenge about our decision.

## Where we store or send your data

We may store the data we collect from you outside the European Economic Area (EEA), or transfer it to organisations outside the EEA. When we do this, we make sure that your data is protected and that:

- the European Commission has deemed the country or organisation to provide an adequate level of protection for personal data
- we've agreed specific contracts approved for use in the EEA which give personal data the same protection it has in the EEA.

Monzo Bank Europe Designated Activity Company forms part of the Monzo group, which has its global headquarters in the United Kingdom. Transfers of personal data to the United Kingdom are done on the basis of the European Commission's adequacy decision (as extended from time to time), which is available [here](#).

## Your rights

You have a right to:

- access the personal data we hold about you (make a data subject access request)
- ask for a copy of your personal data in a portable (machine-readable) format or make us send it to someone else
- request that we correct inaccurate data
- ask us to delete, block or suppress your data. For legal reasons, we might not always be able to do so. There may be times when we continue to use your data when it's in our 'legitimate interest'
- withdraw any consent you've given us, this does not affect how we process your personal data before you withdraw your consent. If we do not rely on consent as a legal basis, we can continue to process your data even if you do not consent to it
- restrict processing of your personal data
- object to the processing of your personal data where the processing is based on our legitimate interests, or where the processing is necessary for the performance of a task carried out in the public interest
- ask a member of staff to review an automated decision
- complain to the Information Commissioner's Office, the Irish Data Protection Commission, or other relevant supervisory authority. We ask that you first contact us to give us an opportunity to address any concerns.



To do any of these things, please email [hire@monzo.com](mailto:hire@monzo.com) or [dpo@monzo.com](mailto:dpo@monzo.com) with your request.

## How to make a complaint

If you have a complaint about how we use your information, please email [dpo@monzo.com](mailto:dpo@monzo.com) and we'll do our best to fix the problem. You can also reach our Data Protection Officer in this way.

If you're still not happy, you can refer your complaint to a [data protection supervisory authority](#) in the EU/EEA country you live or work in, or where you think a breach has happened.

The UK's supervisory authority is the Information Commissioner's Office (ICO). For more details, visit their website at [ico.org.uk](https://ico.org.uk).

The Irish supervisory authority is the Data Protection Commissioner (DPC). For more details, visit their website at [dataprotection.ie](https://dataprotection.ie).