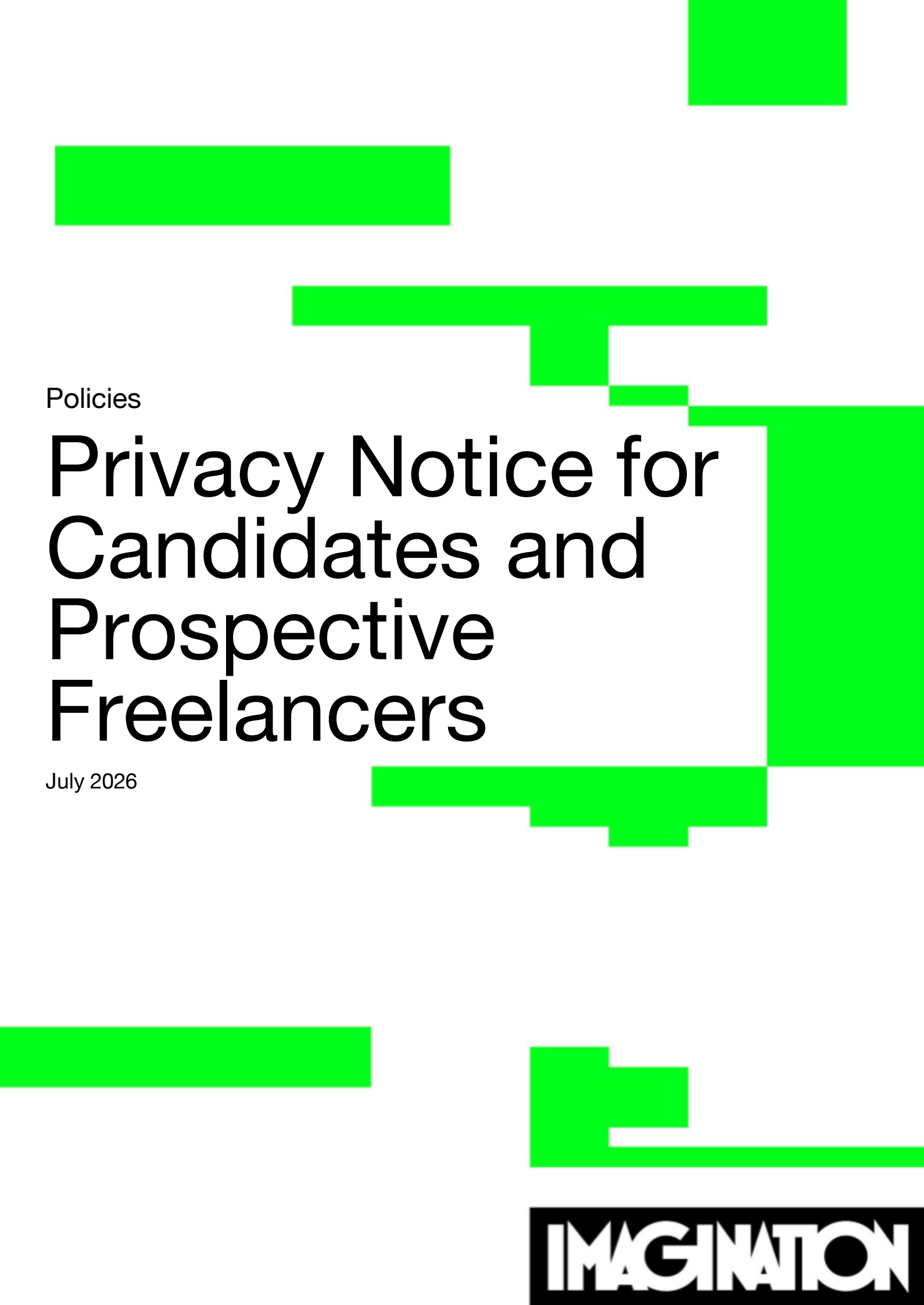




Policies

Privacy Notice for Candidates and Prospective Freelancers

July 2026

IMAGINATION

1. What is a privacy notice?

The Imagination Group Limited ("Imagination") is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. We want to ensure you understand and are aware, as part of our recruitment or onboarding process, what information we collect about you, how we will use it, and for what purpose. We are also required by data protection legislation to explain certain matters to you.

2. What information about you will we collect and use?

As part of the application process for an advertised role, or vacancy or as part of a speculative application with Imagination, we will collect, store, and process personal information about you.

This personal information may include your:

- name, address, contact details, including email address and telephone number;
- eligibility to work in the role location;
- academic record and qualifications, experience;
- recruitment and employment history, including information about your skills, experience, and previous salary details; and
- whether you have a disability for which we need to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the relevant country; and
- any other information you have provided to us voluntarily (including in your CV, cover letter, and during an interview).
- equal opportunities monitoring information, including information about disabilities, your ethnic origin, sexual orientation, health, and religion or belief.
- information generated by, or your interactions with, any recruitment technology, screening software, or artificial intelligence tools that we use as part of our recruitment process (for example, CV-sifting).

We may also collect, store, and process the following "special categories" of more sensitive personal information that you voluntarily make available to us:

- criminal record information (in order to allow us to carry out appropriate criminal record checks).

We obtain this information either directly from you or sometimes from third parties such as freelancers or employment agencies, your former employer(s), and background check agencies.

3. How and why will we use your personal information?

As you will appreciate, we need to use your personal information to process your application and determine your suitability for the role. We also need to ensure that we comply with our legal obligations regarding your right to work in the relevant country and any other regulatory requirements.

In most cases, the legal basis for processing the data will be to ensure that we are complying with our legal obligations or where we need to in order to further Imagination's legitimate business interests. In some cases, for example where we carry out criminal record checks to safeguard the business, we may instead rely on a "recognised legitimate interest", which does not require a balancing test against your interests.

The situations in which we will commonly use your personal information include:

- to make informed recruitment decisions;
- to follow our vetting processes;
- to take steps to enter into a contract
- to make any reasonable adjustments (as notified by you) as part of the interview process

We are guided by the principle that you should not be surprised by any use we make of your personal information.

Where we collect any "special categories" of more sensitive personal information from you, including information about criminal convictions, we do so only where appropriate, given the nature of the role, and where necessary for the purpose of carrying out our legal obligations. Imagination processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where Imagination processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

4. Do we use automated decision-making?

Where we use automated tools as part of our recruitment process (for example, to sift through or shortlist applications), we will tell you if a decision that significantly affects you has been taken solely by automated means. We will always apply appropriate safeguards, including routine human oversight.

5. What happens if you do not provide personal information?

You are required by law to provide certain personal information to us, for example, to enable us to

verify your right to work in the relevant country if your application is successful as a freelancer or if we offer you employment.

If you fail to provide certain personal information when requested, we may be prevented from complying with our legal obligations and therefore would be unable to continue with your application.

6. Who else might your personal information be shared with?

Following our decision to offer you a freelancer contract or a contract of employment (as applicable), we may share your information with hiring managers, previous employers, or named individuals as part of a reference request process.

As some of our supporting systems are located outside of the UK and the European Economic Area (the European Economic Area being the European Union, Iceland, Liechtenstein, and Norway, which is also referred to as the “EEA”), your personal data may be stored and processed in countries that may not have data protection laws that provide the same level of protection as those within the UK or the EEA. However, Imagination will only transfer your personal data outside of the UK and the EEA where appropriate safeguards have been put in place. If you would like to know more about this, see the contact details at the bottom of this notice.

7. For how long will your personal information be kept?

If your application for employment or freelancing is successful, you will be sent a new privacy notice applicable to your time at Imagination. Information gathered during the recruitment process will be transferred and retained in your file in accordance with the new privacy notice provided to you.

Following an unsuccessful application, your personal data will be retained for up to 1 year from the close of the recruitment campaign. This will enable us to deal with any potential or actual disputes or investigations relating to the recruitment exercise and to consider you for any other suitable opportunities that may arise.

If you've registered your interest for any future or speculative roles, we'll keep your personal data for 2 years.

8. How will your personal information be kept safe?

We take the security of your personal information very seriously, and we have put in place internal controls and security measures to protect it. Access to your personal information is restricted to those employees, workers, and agents who strictly need it as part of the onboarding process. We also have cybersecurity measures in place. We take steps to ensure that third parties who have access to your personal data only process it on our instructions and are subject to a duty of confidentiality. We have put in place appropriate procedures to deal with any suspected data security breach.

9. What are your rights in relation to your personal information?

You have certain rights in relation to your personal data as summarised here:

- **Right to be informed:** you have the right to be provided with clear, transparent, and easily understandable information about how we use your personal data and your rights; this is why we are providing you with this privacy notice;
- **Right of access:** you can request access to your personal data;
- **Correcting or erasing your information:** where we hold information about you that is inaccurate or incomplete, you have the right to ask us to rectify or complete it;
- **Right to restrict processing:** you have the right to restrict some processing of your personal information, which means that you can ask us to limit what we do with it;
- **Right to object to processing:** you can object to us processing your personal information in certain circumstances, including where we are using it for the purpose of Imagination's legitimate business interests as set out within this policy;
- **Right to request transfer:** you have the right to request the transfer of your personal information to another party;
- **Right to complain:** if you are in the UK, you are able to submit a complaint to the Information Commissioner's Office (or any successor bodies) about any matter concerning your personal information, using the details below. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them.

Information Commissioner's Office
Wycliffe house
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel 0303 123 1113
www.ico.org

In addition to the above, you are also able to make a complaint directly with us about our processing of your personal data.

If you would like to exercise any of these rights, please contact us using the details below, or for any complaints, please email privacy@imagination.com.

10. Questions?

For more details or any questions about anything in this privacy notice, please contact a member of the People & Culture team.

Policy Owner: Head of Employee Experience