

Last updated: July 2024

## 1. Who we are

Apex Group Limited, its affiliates and subsidiaries ("Apex", "we", "our", "us") is a global financial services provider.

The identity of the data controller for data protection purposes will vary depending on which jurisdiction your interaction with us occurs.

## 2. About this notice

As part of our recruitment process, we collect and process personal information relating to job applicants. We are committed to being transparent about how we collect and use that information and to meeting our data protection obligations.

This privacy notice serves to inform you about what information we collect when you apply to work at Apex (whether as an employee, worker or contractor), why we collect it, how we use it, and to provide you with information about any rights you may have with respect to that information.

## 3. Data Protection Principles

We will comply with data protection law and principles, which means that your personal data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## 4. The kind of information we collect

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

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Identifiers and contact information	Name, title, address, phone number, personal email address, date of birth, gender, nationality, and national identifier.
Demographic information	Age, gender, and race.
Employment history and background checks	Salary history and expectations.  Qualifications, certifications, training and education.  The name and contact details of referees (please note that if you provide us with contact details of referees who are natural persons, it is your responsibility to obtain their consent before sending their information to Apex).
Information in connection with you and/or your job application	Any information you provide to us during an interview and/or contained in your CV and related documents.  Any tests that you may be required to take as part of the interview process, the results of which will be scored against core competencies of the job criteria and will support the selection process.
Cookies	Cookies are small files that collect and save information about your visit to our websites. Please read our cookies policy for further information on this.
Sensitive personal information	Information about your race or ethnicity, religious beliefs and sexual orientation may be collected in certain jurisdictions where it is legally required for diversity hiring purposes. This will normally be on an anonymous basis but varies from jurisdiction to jurisdiction.  Information about your health and medical information e.g. disability / medical condition.

## 5. How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate, such as information included in your CV, covering letter or application form, or any information collected and/or recorded in a written form from phone calls or video interviews with you.
- Third party recruitment agencies, who you have provided your personal information to.
- Experian, a background check provider, from which we collect the following categories of data: Name, contact details, proof of ID (passport) and proof of residence.
- Your named referees, with your prior consent.
- Information from third parties including Thomson Reuters and World Check (who collate information from publicly available sources).
- Statements and decisions that have been published by local regulators.
- In some jurisdictions we may obtain a criminal records check from background check service providers, the police or other national authorities.
- We may also collect your personal information online to the extent that you have chosen to make this information publicly available on professional social media websites. For example, we may find your profile on LinkedIn and contact you about suitable roles.

## 6. How we will use information about you and the legal basis of processing

We will use the personal information we collect about you for the purpose of carrying out our recruitment activities including to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.

- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We may process your personal information based on one of the following legal bases:

- Our legitimate interests in evaluating your application to manage our relationship with you, to ensure that we recruit appropriate employees, and to evaluate and maintain the efficacy of our recruiting process more generally; and in operating our business and protecting the Firm and its employees, clients, and third parties.
- To conclude a potential employment contract with you.
- To comply with applicable laws regarding personal information necessary to satisfy our legal and regulatory obligations, including with regard to public health and workplace safety.
- Upon your consent, if you would like us to consider you for future suitable roles, or if we collect sensitive personal information for legally permitted purposes other than compliance with our legal obligations regarding public health and workplace safety.

## 7. If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

## 8. How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status/medical condition to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether appropriate adjustments need to be made during a test or interview, or to the work environment.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sex life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

We do not conduct background checks (which may include criminal convictions and credit history and will depend on the applicable laws of the country you are situated in and role for which you are applying) until we have confirmed we would like to conditionally offer you a role. You will be informed prior to such a check being undertaken. We are required to carry

out criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which may make you ineligible for the applied role.

## 9. Data transfers and sharing

Apex may share your personal information internally to other Apex offices involved in the recruitment and hiring process, as well as to service providers including technology services and background check providers (where allowed by law). We may also share your personal data with public or government authorities to comply with our legal obligations, regulations or in response to a court order or judicial process.

Apex may disclose or transfer personal information to other offices in the Apex Group that are located in countries outside the European Economic Area, including to jurisdictions that may not be subject to data protection laws similar to those prevailing in the jurisdiction in which such information is provided to or received by us. If personal data is transferred Apex will ensure that appropriate safeguards are in place to enable such transfers.

## 10.Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties on a need-to-know basis. They will only process your personal information on our instruction and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 11.Data retention

We will retain your personal information on our secure recruitment platform for a period of twelve (12) months after completion of the hiring process. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that role, we will contact you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

If you are offered and accept a role with Apex, the information collected during the application and recruitment process will form part of your employment record and is processed subject to the Apex Employee Privacy Notice.

## 12. Your choices and rights as a data subject

You have several legal rights in relation to the personal information that Apex holds about you, and you can exercise your rights by contacting us using the details set out in section 13 below.

Depending on applicable law, these rights may include:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on our legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Make a complaint. You can lodge a complaint with the relevant data protection authority if you think that any of your rights have been infringed by us.

## 13. How to contact us

If you have any concerns or questions about this privacy notice or would like to exercise your rights as a data subject, you can contact our Group Data Protection Officer:

Email: [dpo@apexfs.com](mailto:dpo@apexfs.com)

Post: Group Data Protection Officer | Apex Group Ltd. | Vallis Building, 4th Floor | 58 Par-la-Ville Road | Hamilton, HM11 | Bermuda

## 14.Changes to this privacy notice

We may occasionally update this privacy notice when necessary to reflect changes in the law, our practices and in our services, as well as to ensure it is accurate and up to date. When we make an update we will amend the date at the top of this notice, you are therefore advised to check this privacy notice periodically. We may also notify you in other ways for time to time about the processing of your personal information.