



## **Candidate Privacy Notice**

December 2020

## Who we are

Apex Group Limited, its affiliates and subsidiaries (“Apex”) is a global financial services provider.

In this notice “Apex”, “we”, “our” or “us” may refer to any or all of Apex.

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

## What is the purpose of this notice?

Apex Group Limited, its affiliates and subsidiaries (“Apex”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is intended to inform candidates who are applying to work at Apex (whether as an employee, worker or contractor) how and why their personal data is being used, for the purposes of recruitment, and how long it will be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR) or equivalent local data protection legislation.

## 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.

## The kind of information we hold about you

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

- The information you have provided to us in your curriculum vitae, covering letter or application form, this could include your name, title, address, telephone number, personal email address, date of birth, gender, employment history, educational and training information, qualifications, nationality, immigration/right to work/residency status. As well as the name and contact details of referee (please note that if you provide us with contact details of referees it is your responsibility to obtain their consent before sending their information to Apex.
- Any information you provide to us during an interview.
- 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.

We may also collect, store and use the following types of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs and sexual orientation that we are legally required to collate. This will normally be on an anonymous basis but varies from jurisdiction to jurisdiction.
- Information about criminal convictions and offences.

## How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Third party recruitment agencies, who you have provided your personal data 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.
- Data from third parties which are publicly accessible: Thomson Reuters and World-check.

## How we will use information about you

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.

It is in our legitimate interests to process this personal information to enable us to decide whether or not to appoint you to the role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information in respect of entering into a contract of employment with you, where you are applying for a permanent role.

## 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.

## 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 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 sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

## Information about criminal convictions and background checks

If we would like to offer you a role (conditional on checks and any other conditions, such as references, being satisfactory), we might collect information about your criminal convictions history and perform a background check. You will be informed prior to such a check being undertaken.

## Data transfers and sharing

We will only share your personal information with other entities in the Apex group of companies. All our entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. Apex may disclose or transfer personal data to other offices in the Apex Group that are located in countries outside the European Economic Area. If personal data is transferred Apex will ensure that appropriate safeguards are in place to enable such transfers.

## 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 who have a business need-to-know. They will only process your personal information on our instructions 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.

## Data retention

We will retain your personal information for a period of six 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, we will write to you separately,

seeking your explicit consent to retain your personal information for a fixed period on that basis.

## Complaints and your rights in connection with your personal information

Under certain circumstances, by law you have the right to:

- **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 continuing 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 a 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.

If you have any questions about this notice, want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [enquiriesEU@apexfunds.co.uk](mailto:enquiriesEU@apexfunds.co.uk) in writing.

If you are unhappy with how we process your personal data, you may have the right to complain to a data protection regulator or supervisory authority. We encourage you to

contact us via [enquiriesEU@apexfunds.co.uk](mailto:enquiriesEU@apexfunds.co.uk) in the first instance so we can address your concerns.

### **Changes to this privacy notice**

This privacy notice is dated 25 November 2020. We reserve the right to amend this privacy notice at any time without notice, in which case the date of the policy will be revised.