

Fair Processing Notice (Candidate Personal Data)

CROWN AGENTS INVESTMENT MANAGEMENT LIMITED

1. ABOUT THIS NOTICE

You are considering applying to or have recently applied to a role with Crown Agents Investment Management Limited (“CAIM”, and/or its group companies as defined within the Companies Act 2006, referred to as “we” within this notice). The purpose of this notice is to make you aware of how and why we will use your personal data, and how long it will be retained for. For the purposes of this notice, we will be classified as a “data controller” as defined within the General Data Protection Regulation ((EU) 2016/679) or “GDPR”. You may also have used a recruitment agency in connection with your application. If so, that recruitment agency will also be a data controller, and will deal with your personal data in connection with its own privacy policies.

We will only use your personal data for the purposes set out in this notice; in summary to:

- Assess your skills, qualifications, and suitability for the role you have applied for;
- Communicate with you about the recruitment process;
- Carry out background, financial, identify, criminal and reference checks, where applicable;
- Keep records related to our hiring processes; and
- Comply with legal or regulatory requirements.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles as set out in the GDPR, 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 for as long as necessary for the purposes we have told you about;
- Stored securely.

3. THE PERSONAL DATA WE COLLECT ABOUT YOU

We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name and contact details (i.e. address, phone numbers, personal email address);
- Details of your qualifications, experience, previous employment history (including job titles, salary, and working hours) and interests;
- Details of your referees.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, through references provided by your previous employers and/or education providers;
- Information regarding your academic and professional qualifications;
- Information regarding your criminal record;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- Any further information you provide to us during an interview;
- Any further information obtained through psychometric testing, if undertaken.

Fair Processing Notice (Candidate Personal Data)

We may also collect, store and use certain sensitive personal information falling into the following "special categories":

- Information about your race or ethnicity;
- Information about your health, for example any medical conditions (including any disabilities), or your health and sickness records.

4. HOW WE COLLECT THE INFORMATION

In the first instance, personal data will be collected from you, the candidate, through the application process. If your application is taken further, we may also collect information from your referees (details of whom you will have provided), your education provider, the relevant professional body, the Disclosure and Barring Service (DBS) and the Home Office.

5. WHY WE COLLECT, AND HOW WE WILL USE YOUR PERSONAL DATA

We will typically collect and use this information for the following purposes:

- To assess whether, and then to take steps to, enter into a contract of employment with you;
- For compliance with a legal obligation (such as to check that you are eligible to work in the United Kingdom);
- For the performance of a task carried out in the public interest; and
- For the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

6. HOW WE WILL USE ANY SPECIAL CATEGORY DATA

We will use any information you provide about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example during a test or interview.

We will use information about your race or national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting.

7. CRIMINAL RECORDS CHECKS

As a provider of financial services, we have legal and regulatory obligations to ensure that the people we employ can be relied upon to handle client money and information responsibly. We therefore ask you questions about any prior civil or criminal proceedings you may have been subject to, and may also obtain a certificate from the Disclosure and Barring Service through our third party provider, Experian Limited. We will seek your explicit consent to us carrying out any such checks, prior to any searches being instructed.

8. PROVIDING INFORMATION TO THIRD PARTIES

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. We will only share your personal information with the following third parties for the purposes of processing your application: Experian Ltd.

We ensure that third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. AUTOMATED DECISION MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Fair Processing Notice (Candidate Personal Data)

10. DATA RETENTION

Should you be unsuccessful in your application for a role at CAIM, as applicable, we will retain your personal information for a period of 1 year after we have communicated to you our decision. 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 our data retention policy.

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

11. DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised 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.

12. PROCESSING IN LINE WITH YOUR RIGHTS UNDER THE GDPR

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;
- **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.

13. DATA PRIVACY MANAGEMENT AND BREACHES

We have appointed an internal team to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact us: email: dataprotection@crowngentsbank.com; telephone: +44 (0)20 3903 3000).

If you want to exercise any of the rights set out in paragraph 12 above, please contact us in writing at:

Data Protection
Crown Agents Investment Management Limited
St. Nicholas House
St. Nicholas Road
Sutton
SM1 1EL.

We hope that we can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights.