

Data Protection: Candidate Privacy Notice

1 WHY DO WE HAVE THIS NOTICE?

You are viewing this privacy notice because you are applying for work with us (whether as an employee, temp or consultant). It aims to make you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and for how long it will usually be retained. We are committed to complying with data protection legislation and have appointed a Data Protection Officer (DPO) to oversee compliance with it. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal data about you.

2 WHO COLLECTS THE DATA?

LGT Wealth Management UK LLP, LGT Wealth Management US Ltd, LGT Wealth Management Jersey Ltd and LGT Holdings UK Ltd collectively referred to as "LGT" in this notice. LGT is a data controller and is responsible for processing personal information about you. In this notice, references to "we" or "us" means LGT Wealth Management UK LLP and our group companies.

3 DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal data, as set out in our employee handbook and/or our data protection framework.

4 WHAT INFORMATION MIGHT WE HOLD ABOUT YOU?

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

- The information you have provided to us in your CV and covering letter (your name, contact details, details of qualifications, experience, employment history, interests and details of your referees).
- Any information that you or, if applicable, your recruitment agency, provide to us; for example, current or most recently salary, reason for leaving your current or most recent employer and contact details.
- Any information you provide to us before or during an interview.
- Any information we may collect as part of our assessment process, for example, test results.

We may also collect, store and use the following special categories of more sensitive personal information (Special Categories):

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition and/or disability, health and sickness records.
- Information about criminal convictions and offences.

We may collect the following data before making a final decision to recruit:

- Data about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers.
- Data regarding your academic and professional qualifications.
- Your nationality and immigration status and data from related documents, such as your passport or other identification and immigration information.
- A copy of your driving licence.

5 **HOW IS THIS INFORMATION COLLECTED?**

We collect personal information about you from the following sources:

- You, the candidate.
- Recruitment agency, from which we collect the following categories of data: CV, contact details, salary information.
- A background check provider, from which we collect the following categories of data when you have been offered a role with us and which requires your express consent to process:
 - Criminal record collected from DBS and credit history.
 - From named referees, confirmation of your employment dates and roles and as appropriate, a personal reference to cover any gaps dating back 5 or 10 years (depending on the role).
 - Regulatory and professional qualifications, including confirmation that a Disqualification Directive has not been issued to you and that, if applicable, Approved Person status has been maintained throughout your employment to date, as appropriate for your role.

6 **HOW DO WE USE THIS INFORMATION?**

We may use the personal information we collect about you for the following purposes:

- To assess your skills, qualifications, and suitability for the position.
- To communicate with you about the recruitment process.
- To make informed decisions about the recruitment process.
- To keep records related to our hiring processes.
- To comply with legal or regulatory requirements.
- For the performance of a task carried out in the public interest.
- For the purposes of our legitimate interests or those of a relevant third party (such as a benefits provider), but only if these are not overridden by your interests, rights or freedoms.

- It may be necessary for carrying out or exercising rights in employment law.

It is in our legitimate interests to decide whether to appoint you and to process your personal information to make this decision. We are also permitted to process this information to take steps prior to entering into any potential contractual agreement with you.

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

7 **HOW DO WE USE YOUR SPECIAL CATEGORIES OF PERSONAL INFORMATION?**

We may use your Special Categories of personal information in the following ways (to comply with our legal obligations and/ or to monitor equality issues):

- We may use information about your disability status or religious beliefs to consider whether we need to provide appropriate adjustments during the recruitment process.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

8 **INFORMATION ABOUT CRIMINAL RECORDS**

We envisage that we will process information about criminal records.

We will collect information about your criminal records history if we have offered a role to you. The offer is conditional on checks and any other conditions, such as references, being satisfactory. We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the Financial Conduct Authority to carry out criminal record checks for those carrying out a regulated client advisory role.
- Furthermore, LGT believes that in line with best practice in our industry, it is appropriate to ensure all roles are subject to criminal record checks.

We have in place an appropriate policy document and safeguards, which we are required by law to maintain when processing such data.

9 **DATA SHARING**

We will only share your personal information with our background check provider for the purposes of processing your application. Our third-party service providers and other LGT group entities are required to take appropriate security measures to protect your personal information in line with our policies. Usually, data will be anonymised but this may not always be possible. The recipient of the data will be bound by confidentiality obligations. We may also be required to share some personal data as required to comply with the law.

10 **DATA SECURITY**

We have put in place appropriate technical and organisational security measures to prevent your personal information from being accidentally lost, used, accessed altered or disclosed in an unauthorised way. We limit access to your personal data to those who have a genuine business

need to know it. Those processing your data will do so only in an authorised manner and 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 data security breach where we are legally required to do so.

11 DATA RETENTION

We keep the personal data that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your data will depend on whether your application is successful and you become employed by us, the nature of the data concerned and the purposes for which it is processed. If you apply for a job and your application is successful, your data may be used in connection with your employment and in line with our data protection policies. If you apply for a job and your application is unsuccessful (or you withdraw from the process or decline our offer) we will retain recruitment data for no longer than is reasonable, after which your personal information will be destroyed in accordance with our data retention provisions. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

We retain this information for various reasons, including the possibility that we face a legal challenge in respect of a recruitment decision, to consider you for other current or future jobs and to help us better understand, analyse and improve our recruitment processes. If you do not want us to retain your information for consideration for other roles, or want us to update it, please contact the Human Resources team (human.resources-uk@lgt.com). Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

12 RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

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

- **Request access** to your personal information (commonly known as a “data subject access request”) if you would like to receive a copy of the personal information we hold about you.
- **Request correction** of the personal information that we hold about you if you would like to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of some but not all of the data we hold and process to be erased in certain circumstances if you would like 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. If you object, we can no longer process your data unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

- **Request the restriction of processing** of your personal information if you would like 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 wish to exercise any of these rights, please contact a member of the Human Resources team.

13 **QUESTIONS AND COMPLAINTS**

If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO, Barbara Kane at barbara.kane@lgt.com. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113, which is the UK's supervisory authority for data protection issues, or to the Office of the Information Commissioner (OIC), which is Jersey's supervisory authority for data protection issues.