

## What is the purpose of this document?

James Hay Partnership Management Limited (referred to as “we” or “us” or “James Hay”)) respect your privacy and is committed to protecting your personal data. James Hay is a personal “data controller”. This means that we are responsible for deciding how we hold and use personal information received from individuals (prospective employees or consultants / contractors (referred to as “you” or “candidates”)) applying for roles at James Hay, during the recruitment and resourcing processes.

This privacy statement makes you aware of how and why your personal data will be used, namely for the purposes of recruitment and resourcing activities, 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) and the UK Data Protection 2018, as amended by law from time to time.

## Data protection principles

We will comply with data protection law and principles, which means that your 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, i.e. in relation to recruitment and resourcing activities.
- 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 and protected against unauthorised or unlawful processing and against loss or destruction using appropriate technical and organisational measures.

## 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 information about you:

- The information you have provided to us in your Curriculum Vitae (“CV”) and covering letter.
- The information you have provided on our application form(s), including (but not limited to) name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, other skills and professional memberships.

- Any information you provide to us during an interview, or selection test results.
- Your identification, as verified at interview for 'right to work' purposes.
- Any information which has been published or made available on a social media profile, account or job board (whether by you or a third party)
- The results of pre-employment screening or vetting checks which we are required to undertake in relation to you
- Any electronic communications, including SMS texts, email and attachments, which you send to us
- Any personal information about you given to us by your referees

We may also collect, store and use the following "special categories" of more sensitive personal information that you provide us (where applicable) and/or that we collect from third parties (such as CV Insights) about you regarding:

- your race or ethnicity.
- your health, including any medical condition, health and sickness records.
- criminal convictions and offences.

**The above shall apply whether you apply direct to James Hay or via our resourcing partner (OPR Associates Limited (OPRA)) or any other third party appointed by James Hay or OPRA to coordinate its recruitment and resourcing requirements. How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Our approved resourcing partner (OPRA) and other recruitment agencies from which we collect personal data related to the recruitment activity, as provided.
- CV Insights, background check provider, credit reference agency and facilitator of Disclosure and Barring Service in respect of criminal convictions, from which we collect various data, as provided.
- Your named referees, from whom we collect various personal data, as provided.

### How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, competency, 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 decide whether 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 to decide whether to enter into a contract of employment or services with you.

Having received your CV and covering letter / your application form(s), we will send this to OPRA and will then process that information to decide whether you meet the basic requirements to be considered for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use this information, and the information you provide to us at the interview, and the results from any test(s) which you took during the selection process to decide whether to offer you the role. If we decide to offer you the role, we will then take up references, and carry out necessary checks such as credit checks / criminal record checks, before confirming your appointment.

### **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. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application/offer of employment further.

### **How we use particularly sensitive personal information**

We will use your personal information in the following ways:

- We will use information about your disability status, should that apply, to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test for interview. If an offer is subsequently made, then we will, naturally, use this information to assist in our consideration of any necessary and appropriate adjustments to be provided in the future and ongoing working relationship.
- We will use information about your race or nationality or ethnic origin, to ensure meaningful equal opportunity monitoring and reporting, as may be required.

## Information about criminal convictions

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled 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:

- Certain roles require a high degree of trust and integrity since they involve dealing with for example, high value investor money, vulnerable investors, and investor data and so we would like to ask you to seek a basic disclosure of your criminal records history.
- In addition, we have a duty of care to our existing staff population and must at all times endeavour to meet this.

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

## Automated decision-making

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

## Data sharing

### **Why might you share my personal information with third parties?**

We will only share your personal information with the following third parties for the purposes of processing your application: our resourcing partner (OPRA), James Hay approved recruitment agencies, our referencing and vetting provider (CV Insights) and other entities within the group (those companies belonging to our parent company) as listed at <https://www.jameshay.co.uk/legal/> from time to time. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with GDPR guidance. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 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.

**Think Customer – Do the Right Thing – Work as a Team – Take Responsibility**

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

### How long will you use my information for?

We will retain your personal information for a period of twelve (12) months after we have communicated to you our decision about whether to appoint you to the role. 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, beyond this period, 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.

## Rights of access, correction, erasure, and restriction

### Your rights in connection with 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 want to review, verify, correct your personal data, you can do so by contacting [HR@jameshay.co.uk](mailto:HR@jameshay.co.uk). If you wish to 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 send an email to [dataprotection@jameshay.co.uk](mailto:dataprotection@jameshay.co.uk).

### **Right to withdraw consent**

When you applied for this role, you provided consent to us and OPRA processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact James Hay Human Resources Department ([HR@jameshay.co.uk](mailto:HR@jameshay.co.uk)). Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our data retention policy (see above), we will dispose of your personal data securely.

### **Data protection officer**

We have appointed a Data Protection Officer (DPO) 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 the DPO via email [dataprotection@jameshay.co.uk](mailto:dataprotection@jameshay.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.