

EFG – PRIVACY NOTICE FOR CANDIDATES

WHAT IS THE PURPOSE OF THIS DOCUMENT?

EFG Wealth Solutions (Jersey) Limited is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, consultant or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under relevant data protection legislation. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

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.
- 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

Personal data, or personal information, means any information relating to an identified or identifiable individual. 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 and any covering letter you may have attached.
- Information relating to your application including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications
- Any information you provide to us during an interview.
- Results of any Discus profile that may be undertaken

There are special categories of personal data which require a higher level of protection (special category data). We may also collect, store and use the following special category data about you:

- Information about your health, including any medical condition, health and sickness records.
- 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.
- A recruitment agency on your behalf
- An existing EFG employee if they have introduced you
- cValuate background check provider, from which we collect the following categories of data:
 - Employment History Reference checks – 5 years or 3 employers (whichever is longer)
 - ID Verification
 - ID Check
 - Terrorist sanction
 - Credit Checks
 - Right to Work
 - Proof of current residency
 - Verification of professional qualifications/membership
 - Verification of highest level of education
 - A basic check for any unspent convictions

cValuate has its own privacy policy which will be made available to you as you go through this process.

HOW WE WILL USE INFORMATION ABOUT YOU

We will use the personal information we collect about you 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 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 with you.

Having received your CV and/or covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted 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 the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references (as listed under cValue above 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 further.

HOW WE USE SPECIAL CATEGORY DATA

We will use your particularly special category data 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 adjustments need to be made during interview.

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 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 Jersey Financial Services Commission to carry out criminal record checks for those carrying out certain roles.
- If the role you are applying for is one which is listed in the Rehabilitation of Offenders (Exceptions)(Jersey) Regulations 2002, you will be eligible for a standard or enhanced check from the Disclosure and Barring Service.

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

We will only share your personal information with the following third parties for the purposes of processing your application: cValueate and other EFG Group entities to facilitate the recruitment process.

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 our policies. 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.

We will transfer the personal information we collect about you to countries which are Unauthorised Jurisdictions. To ensure that your personal information does receive an adequate level of protection we will ensure an adequate level of protection which may include putting in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects Guernsey and Jersey laws on data protection: and binding corporate rules. If you require further information about these protective measures, you can request it from the Privacy Officer (at email address privacyofficer@efgwealthsolutions.com)

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. Details of these measures may be obtained from the Privacy Officer.

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 six months after we have communicated to you our decision about whether to appoint you to the role for which you have applied. 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 and applicable laws and regulations.

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 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 the Privacy Officer in writing.

RIGHT TO WITHDRAW CONSENT

When you make an application for a role you consent to us 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 Privacy officer. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) and a privacy officer 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 privacy officer (privacyofficer@efgwealthsolutions.com). You have the right to make a complaint at any time to the relevant Information Commissioner and to appeal the outcome of any such complaint.