

For internal use only				•
FADV Reference No.		Applicant ID / SR No.		

# **Candidate Privacy Notice**

For the purposes of recruitment Natwest Group needs to collect and process information about candidates. Natwest Group will be the data controller in respect of the processing of this information. This notice is intended to provide you with information about the processing of your information for recruitment purposes only. (We have a separate notice for Employee Information)

#### 1. WHAT INFORMATION DO WE COLLECT?

In our candidate selection process we collect and use information that you volunteer, for example information you include in your CV or may post on jobseekers websites and job boards. In considering your application, we will only collect and use the information that we need in order to process your application. The types of information Natwest Group collects and processes in relation to candidates may include (subject to local requirements) the following:

Name

Contact details

Candidate status

Work history/job data

Education and qualifications

Compensation

Employer feedback/references

Nationality/visa/right to work permit information

Administrative and national identifying numbers (e.g. passport, driving licence, National Insurance numbers)

Results of screening checks (e.g. credit history, criminal records checks where permitted under local law) – see Section 2 below for more information about screening checks collectively known as "Candidate Information")

Some categories of Candidate Information warrant greater protection ("Sensitive Candidate Information"), which include information relating to a person's:

Physical or mental health or condition (including genetic data)

Sexual orientation

Trade union membership

Racial or ethnic origin

Political opinions

Religious or philosophical beliefs

Criminal history (including commission or alleged commission of a criminal offence)

Natwest Group only collects this information: (i) where permitted by local law (e.g. for the purposes of equal opportunities monitoring); and (ii) where necessary for recruitment for the role you are applying for. If required by local law, your consent may be requested for the processing of this information.

### 2. SCREENING CHECKS

As part of the Selection process, Natwest Group performs a number of screening checks, where permitted by local law. These checks are only performed on candidates who have been selected for a role. Your consent will be requested before screening checks are performed.

### 2.1. Criminal records checks

Given the nature of our business, 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 questions about any prior civil or criminal proceedings you may have been subject to and may also conduct criminal record checks.

### 2.2. Credit reference agencies

We will undertake searches about you at credit reference agencies who will supply us with information, including information from the electoral register, in support of our recruitment decision. The agencies will record details of the search but will not make them available for use by lenders to assess your ability to obtain credit. We may use scoring methods to assess this application and to verify your identity.

You have the right of access to your personal records held by credit reference agencies. We will supply their names and addresses upon request.

India Data Gathering Form Last revised on October 2020

<sup>&</sup>lt;sup>1</sup> For the purposes of this document Natwest Group means all entities within the Natwest (including entities in which an Natwest Group entity has a ≥50% interest or a controlling interest).

#### STRICTLY CONFIDENTIAL WHEN COMPLETE

#### 2.3. Fraud prevention agencies

To prevent or detect fraud, or assist in verifying your identity, we may now and periodically make searches of Group records and at fraud prevention agencies. Should our investigations identify fraud or the commission of any other criminal offence by you (on your part) when applying for, or during the course of your employment with us, we will record details on this on fraud prevention databases. This information may be be accessed from the UK and other countries and used by law enforcement agencies and by us and other employers (and potential employers) to prevent fraud. Please contact us if you want to receive details of the relevant fraud prevention databases through which we share information.

#### 2.4. Regulatory screening

In order to comply with our legal and regulatory obligations in relation to anti-money laundering and sanctions restrictions, we will screen your name against global sanctions lists. The screening will simply involve searching our internal and third party databases to ensure you are not on a sanctioned list. We are not able to employ anyone on a sanctions list.

In addition, in order to comply with our legal obligations relating to anti-bribery and corruption, we will also perform searches and ask questions to assess whether there is a potential bribery or corruption risk to the role based on your personal and political associations. If there is a risk we will look to assess what additional internal controls we need to put in place to reduce that risk.

#### 3. HOW WILL YOUR INFORMATION BE USED?

This information will only be processed in relation to considering your application for a role with Natwest Group, as described below, and in accordance with applicable local laws.

### 3.1. Information Collection

Natwest Group may use external service providers to collect, process and/or validate Candidate Information. Natwest Group requires that any such external service provider will ensure adequate protection for Candidate Information and complies with local legal requirements.

Natwest Group may collect candidate feedback and opinions periodically (e.g. surveys) for business purposes, such as improving processes. You are free to choose whether to respond to these surveys or not to respond and will not suffer reprisals for your decision.

#### 3.2. Disclosure Within Natwest Group

To operate as a global business, it may be necessary for us to share Candidate Information between Natwest Group businesses (e.g. as some of our processes are centralised). This may involve transferring Candidate Information outside your country of residence, and potentially to countries which are not regarded as providing an adequate level of protection for personal data by your local legislation. Processing and/or transfer of Candidate Information and release of information within Natwest Group and/or to third parties outside your country of residence is subject to local law and, where required, will be subject to your consent, and we will ensure that adequate security measures and other local legal requirements are met.

#### 3.3. Disclosure to Third Parties

Natwest Group may be obliged to disclose certain Candidate Information to third parties such as Government Authorities.

It may be necessary to disclose certain Candidate Information to a supplier or contractor organization supplying services on Natwest Group' behalf which

require the use and/or creation of Candidate Information.

It may also be necessary to disclose Candidate Information so as to protect the legal interests and other rights of Natwest Group (for example, recording your information on an external fraud database if the information you have provided is fraudulent).

## 4. HOW DO WE PROTECT YOUR INFORMATION?

The Natwest Group has policies and procedures in place, including a mandatory Information Security policy, which require that Candidate Information is protected with physical, technical and procedural safeguards that are proportionate to the sensitivity of the personal information which we store. These safeguards are designed to protect your personal information from loss and unauthorized access, copying, use, modification or disclosure. Natwest Group will ensure that third parties who process your information on our behalf also have equivalent or greater safeguards in place.

The Natwest Group also has a mandatory Records Management policy which requires that data is kept for no longer than is required and is then securely destroyed.

### 5. YOUR RIGHTS

Under your local law you may have the right to access the information that Natwest Group holds about you (subject to certain legal limitations). To do this you should send a request in writing to your Natwest Group recruitment contact. Similarly, if you are concerned with the accuracy or completeness of any Candidate Information, and you wish to rectify it, please notify your Natwest Group recruitment contact

You are encouraged to ensure that the Candidate Information you provide to Natwest Group is kept up to date and amend any information which is inaccurate or out of date.