



Job Applicant Data Protection Notice

March 2024

CITCO

Job Applicant Data Protection Notice

Effective: March 2024

1. Introduction

The Citco Group Limited and its member companies (collectively, "Citco") respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This Job Applicant Data Protection Notice ("Notice") sets out how Citco processes your personal information when you apply for a job or other role with us and the rights you have in connection with that personal information. The term "applicant(s)" is used in this Notice to refer to anyone who applies for a job, or who otherwise seeks to carry out work with or for us (whether on a permanent or non-permanent basis).

In the context of your relationship with us, Citco is a "Data Controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Notice.

2. Scope

This Notice will apply to you if you are a job applicant who has applied for any role with Citco whether directly through our recruitment website (and/or related follow up communications during the recruitment process) or indirectly through a recruitment agency. This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time.

3. Data protection principles

Citco is committed to complying with data protection laws and this Notice supplements our Data Protection Notice which says that the personal information we hold about you must be:

- a) Used lawfully, fairly and in a transparent way.
- b) Collected only for valid purposes that we have clearly explained to you and not used by Citco in any way that is incompatible with those purposes.
- c) Relevant to the purposes we have told you about and limited only to those purposes.
- d) Accurate, capable of being corrected and kept up to date.
- e) Kept only as long as necessary for the purposes we have told you about.
- f) Kept securely.

4. Types of Personal Information Citco collects when you apply

4.1. Information that we collect automatically when you visit Citco's career site

You can visit Citco's career site, including the recruitment section of our website, ("Website") and search for jobs without providing personal information. However, we do collect certain information automatically from your device when you visit our Website. We may also collect information about how your device has interacted with us, including the pages accessed and links clicked, how you navigate to and from the Website, crashes and download errors and response times. Learn more about cookies and other similar technologies, including how to amend your cookie settings by referring to our relevant Cookies Notice – <https://www.citco.com/use-of-cookies-career-site>.

4.2. Personal Information collected from you during the recruitment process

Citco will collect and process your personal information as appropriate to the stage of the process, the role you have applied for and in accordance with applicable laws. This includes (but is not limited to):

- **Identification data and contact details** – including your name, address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)).
- **Employment history** – such as previous employers and job titles/positions.
- **Background information** – such as academic/professional qualifications, job qualifications, education, skills, experience, details included in your CV/résumé (which might include details of any memberships or interests constituting sensitive personal information), transcripts and employment references.
- Contact details for any personal or previous employer references (including name, contact details, employer and job role).
- Details of your **immigration/visa status**.
- **Previous applications/roles** (information relating to previous applications you have made to Citco and/or any previous employment history with Citco).
- Your performance in technical assessment(s), cognitive assessments, aptitude/psychometric test(s), and other assessments (if any) we may ask you to undertake (in accordance with applicable law).
- Information about your personal circumstances, such as your availability for interviews, your notice period, your reasons for applying to Citco, and any adjustment you require in attending interviews or taking up a position within Citco.
- **On-premise monitoring** - we monitor our offices and other workplace facilities through video monitoring (e.g., closed-circuit television ("CCTV")) and badge scans for security purposes, subject to the requirements of local law and internal policy. CCTV, which captures images and video footage, is primarily used to monitor office

entry/exit points, elevator lobbies, rooms housing valuable equipment (e.g., server rooms), and other select areas that contain highly sensitive assets or are associated with a high risk for theft.

- **Other information you voluntarily provide** throughout the process, including through assessment centers / exercises and interviews.

As a general rule, during the recruitment process, Citco tries not to collect or process any of the following: information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health/sex life ("Sensitive Personal Information"), unless authorised by law or where necessary to comply with applicable laws.

However, in some circumstances, Citco may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes (for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role). You may provide, on a voluntary basis, other Sensitive Personal Information during the recruitment process. Citco is committed to providing equal employment opportunities and any Sensitive Personal Information you provide will be treated securely and in confidence and will not impact the hiring decision.

4.3. Personal information collected from other sources

Citco may collect personal information about you from the following sources (in each case, where permissible and in accordance with applicable law):

- References provided by referees.
- Other background information provided or confirmed by academic institutions and training or certification providers.
- Criminal records data obtained through criminal records checks.
- Information provided by background checking agencies and other external database holders (for example credit reference agencies and professional / other sanctions registries).
- Information provided by recruitment or executive search agencies.
- Information collected from publically available sources, including any social media platforms you use (e.g. LinkedIn Profile URL and associated LinkedIn hiring tools) or other information available online.

Without the abovementioned types of information, Citco's ability to assess your suitability for a particular job within Citco is limited. You may also decide to provide Citco with personal data and information that Citco has not specifically requested (such as your hobbies or social preferences). All information provided is voluntary as you determine the amount of information that you wish to share with Citco.

5. Purposes for processing your Personal Information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- **HR Administration and Talent Analysis:** To ensure that we effectively manage and administer all aspects of our recruitment process, to review and assess your application, and to ensure the fairness in our recruitment process.
- **Business Administration:** To facilitate our day-to-day business operation in general, including in relation to matters such as business planning and budgeting.
- **Corporate Governance:** To manage our risks and safeguard the assets, reputations, and other rights and interests of Citco as well as that of our workforce, clients, and other stakeholders.
- **Communication:** To communicate with you in relation to the recruitment process, scheduling of interviews, providing of two-way feedback on the recruitment process, to contact you in the event of an alternative career opportunity at Citco (or other job openings).
- **Profiling and Automated Decision Making:** From time to time as part of its recruitment process, Citco may rely upon certain premium services offered by our vendors LinkedIn and/or Indeed that provide customized search functionality and tools as part of LinkedIn's talent solutions and Indeed's employer products. Some of the solutions offered by LinkedIn and Indeed leverage AI-supplemented functionalities with respect to data analysis, job posting data, candidate identity data and application data. The AI applied by LinkedIn and Indeed does not make final interviewing or hiring decisions and does not override user input. If you have a LinkedIn account, your account settings affect the availability of your profile and whether you have certain searchable fields in your profile. Your LinkedIn account settings also affect the extent to which LinkedIn may use your personal information as part of its automated processing activities. Citco does not control or influence your LinkedIn account or its settings. Information about your LinkedIn account, how LinkedIn may process your personal information and how to update your LinkedIn privacy and security settings can be found here: www.linkedin.com/legal/privacy-policy. Similarly, if you have an Indeed account, your account settings affect the availability of your profile and whether you have certain searchable fields in your profile. Your Indeed account settings also affect the extent to which Indeed may use your personal information as part of its automated processing activities. Citco does not control or influence your Indeed account or its settings. Information about your Indeed account, how Indeed may process your personal information and how to update your Indeed privacy and security settings can be found here: <https://hrtechprivacy.com/brands/indeed#privacypolicy>.

Separately, Citco itself may also process your personal information in relation to your application for data and statistical analysis including to analyse application information to assess your suitability for a role against the role requirements or description and to improve our recruitment processes and experiences. We may deploy specific technologies (automated employment tools) for the purposes of enabling certain global-level recruiting analysis and diversity monitoring with your consent, where permitted by applicable law, to comply with legal requirements or in Citco's legitimate interests. All decisions by Citco itself regarding the use of automated employment tools also include the use of human review and/or intervention. You will not be subject to decisions by Citco that will have a significant impact on your application based solely on automated decision-making.

- **Legal and Regulatory Compliance:** To ensure our compliance with all relevant legal, regulatory and contractual requirements, including the following:
 - a) requirements that apply to us in our capacity as an employer, including those that relate to immigration, equal opportunity, anti-discrimination practices, health and safety at work, and integration of workers with disability or illness;
 - b) requirements that apply to us as a regulated business and which are imposed or enforced by regulators;

- c) requirements which are imposed or enforced by other public authorities, such as tax authorities, police and other law enforcement bodies, and courts and tribunals;
- d) any other legal duty which we owe to our workforce, clients, and other stakeholders, whether such duty is rooted in statute, contract, or tort; and
- e) taking steps to defend Citco against any legal action.

Under applicable data privacy law, we are required to satisfy one or more specified legal grounds before we can collect and use your personal information. Citco relies on the following legal grounds where processing your information in connection with the recruitment process:

- **Performing or entering into a contract.** As part of the recruitment process it is necessary for us to process your information to assess your skills, qualifications and background for a particular role, verify your information, carry out reference checks or background checks (where applicable), manage the hiring process, and communicate with you about it.
- **Pursuing our legitimate interests.** Where such processing is not overridden by your rights, we are permitted to use your personal information to pursue our legitimate interests, for example for management reporting and to protect the rights and interests of Citco, our employees, applicants and others, as required and permitted by applicable law.
- **Compliance with our legal obligations.** We may need to process your information to meet our legal obligations, including those under immigration and employment laws.
- **Consent.** In some limited circumstances, we may rely on your consent to collect and use your personal information. We would not ordinarily rely on consent, but occasionally, where none of the other legal justifications are available to us, we may choose to rely on Consent. If we rely on consent, this will be made clear to you at the time we request your information. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact privacy@citco.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have a legitimate basis for doing so. If you are accepted for a role at Citco, the information collected during the recruitment process will form part of your ongoing staff member record and will be processed in accordance with our Privacy Notice for Employees, Workers and Contractors.

6. Who we share your Personal Information with and transfers abroad

We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

6.1. Transfers to other group companies

We will share your personal information with Citco affiliates in order to administer our recruitment processes and store data.

6.2. Transfers to third party service providers

We may make certain personal information available to third parties who provide services relating to the recruitment process to us, including:

- recruitment or executive search agencies involved in your recruitment;
- background checking or other screening providers and relevant local criminal records checking agencies;
- data storage, shared services and recruitment platform providers, IT developers and support providers and providers of hosting services in relation to our careers website; and
- third parties who provide support and advice including in relation to legal, financial / audit, management consultancy, insurance, health and safety and security.

We use Oracle as a vendor to provide the recruitment system we use. Their privacy policy can be found here: <https://www.oracle.com/legal/privacy/services-privacy-policy.html>. We also use HireRight as a vendor to provide pre-employment and employment background verification services. Their privacy policy can be found here: <https://www.hireright.com/legal>.

We may also disclose personal information to third parties on other lawful grounds, including:

- Where you have provided your consent;
- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant;
- In response to lawful requests by public authorities (including for tax, immigration, health and safety, national security or law enforcement purposes);
- As necessary to establish, exercise or defend against potential, threatened or actual legal claims;
- Where necessary to protect your vital interests or those of another person; and/or
- In connection with the sale, assignment or other transfer of all or part of our business.

In some cases, the sharing described above may result in your personal information being transferred internationally, including from the European Economic Area to a jurisdiction outside it. These countries may have data protection laws that are different to the laws of your jurisdiction (and, in some cases, may not be as protective).

Specifically, Citco, its affiliate entities and third party service providers operate around the world. This means that when we collect your personal information we may process it in any of these jurisdictions in compliance with applicable data privacy laws.

7. Data Retention

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally this means your personal information will be retained:

- in accordance with the retention periods set out in Citco's Privacy Notice for Employees, Workers and Contractors (where you become our employee); or

- for a period of two years after confirmation that your application was unsuccessful unless you request that we delete your application.

In some circumstances, we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you as it is no longer considered to be “personal information” by which you can be identified.

8. Your Data Privacy Rights

Depending on where you live and subject to applicable data privacy law, you may have the following rights in respect of any personal information collected and processed about you by us:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided below.
- You can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided below.
- As mentioned above, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information (discussed below). For more information, please contact your local data protection authority.

9. Questions or Complaints

Our Chief Privacy Officer oversees how we collect, hold, use and disclose personal information and protect your personal information to ensure your rights are fulfilled. For questions about this notice, to exercise your rights regarding your personal information held by us, or to make an enquiry, please contact our Data Protection Officer or privacy team:

c/o Citco Technology Management (Ireland) Limited
Custom House Plaza, Block 5, IFSC Dublin 1, Ireland

Privacy Team Email: Privacy@citco.com

Data Protection Officer Email: dpo@citco.com

Phone #: Toll Free: +1 800 457 2251 / Americas: +1 201 793 5858 / Europe: +41 22 591 1212

You may make a complaint about an alleged breach by us of applicable privacy laws in relation to our handling of your personal information. Your complaint should be in writing and addressed to our Data Protection Officer. Alternatively, you have a right to lodge a complaint with the competent supervisory authority.

10. Notice of Changes

We keep this notice under regular review and may modify or amend it from time to time at our discretion. If we make changes, we will record the date of amendment or modification at the top of the notice. The revised notice will apply to you and your information from that date. We would encourage you to review this notice periodically.

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