



P R I V A C Y P O L I C Y

WHO ARE WE?

Financial Careers Ltd, incorporated as Financial Careers Ltd. Our registered address 7 Bell Yard, London, England, WC2A 2JR and you can contact us for all personal data privacy matters by email at info@financialcareersltd.co.uk or by telephone on +44 (0) 2032862545.

Financial Careers Ltd provides recruitment services, including permanent and temporary recruitment services to clients looking to recruit staff for their businesses. For the purposes of compliance with local laws in force from time to time, the registered entity in your market or who you do business with will be the data controller.

Financial Careers Ltd aims to comply with all applicable Data Protection legislation, industry best practice and all local laws.

This Privacy Notice:

- Sets out the legal basis we have for using your personal data
- Sets out the types of personal data that we collect about you
- Explains the different rights and choices you have when it comes to your personal data
- Explains how and why we collect and use your personal data
- Explains how long we keep your personal data for
- Explains when, why and with who we will share your personal data
- Explains the effect of refusing to provide the personal data requested
- Explains how we may contact you and how you can contact us.

WHAT PERSONAL DATA DO WE COLLECT?

We collect information about you which enables us to find available opportunities and assess your suitability throughout the recruitment process. This is collected in our capacity as a recruitment agency. We may collect personal information including but not limited to your first name, surname, email address (both personal and business), telephone number, residential address, job title, company name, financial information, job function, location, sector, CV, identification documents, evidence of right to work (RTW), educational records, work history, next of kin and emergency contact details, references and links to your professional profiles available in the public domain and on social media, such as LinkedIn and corporate websites.

We may also collect some sensitive personal data about you, in the form of health or medical information (including details of any special assistance you may need or any sick leave taken during previous roles) to fulfil our employment, social security and other regulatory or legal obligations. With your express consent, we may also collect other sensitive personal data from you such as your ethnic origin. Where you have been required to give your explicit consent, you will always be entitled to withdraw such consent at any time.

WHERE DOES THE PERSONAL DATA WE COLLECT ABOUT YOU COME FROM?

The following are the different sources we may collect your personal data from:

- Directly from you. This is information you provide whether searching for a new opportunity, during the different recruitment stages or at a recruitment or networking event. This may be by telephone, email or in person.
- From an agent/third party acting on your behalf. This may be your own limited company, an umbrella company or another recruitment agency.
- From third party sources. We may obtain your personal information from the following third-party source(s):
- Job Boards that you have registered your details with and where we are clearly and specifically named as a recruitment company with whom your data may be shared.
- By Reference or word of mouth. For example, you may be recommended by a friend, a former employer, an ex colleague or even a present employer. However, we will always seek your prior valid consent before processing your data.

HOW & WHY WE USE YOUR PERSONAL DATA?

We will use your data in order to provide our services to you, including:

- To match your skills, experience and education with a potential employer or client or current job opportunities.
- To provide career guidance and management.
- To provide more detailed information to a client, should you be chosen by the client to go through to the next stage of the interview process.
- To keep you informed of job opportunities which we think may be of interest to you.
- To respond to your requests or questions when you contact us.
- To carry out our contractual obligations with you or with a client, including under any contracts we intend to enter with you.
- To notify you of changes in our services or in this Privacy Policy.
- To third parties (see below).

- If you work for a client or a potential employer looking to fill roles, to contact you about prospective candidates or leads and to share your contact details with a candidate, at interview stage and beyond.
- To manage our relationship with you and with our clients and perform administrative and operational tasks.
- To comply with our legal obligations and rights, under contracts and at law, and to cooperate with authorities and investigations.

WHAT MARKETING COMMUNICATIONS MIGHT WE SEND YOU?

We may from time to time send you information that we think you will find interesting and beneficial. Such as other jobs that we believe will be of interest.

Our legal basis for sending you any direct marketing information via electronic means - by email, social media, SMS - falls into two categories of 'consent':

1. By obtaining your valid, expressed, consent through an opt-in mechanism at the time of collecting your personal data and providing you with the opportunity to opt-out in all subsequent communication by clicking the "unsubscribe" link in an email received from Financial Careers Ltd or by contacting us at info@financialcareers.com.
2. Via the soft opt-in consent route, which applies when you have previously engaged with us (e.g.: by submitting a job application or a CV or registering to fill a job vacancy we have posted). Under 'soft opt-in' consent we view your consent as implied unless or until you opt out.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your personal information only for as long as is necessary in line with the reason for which we process it, as described above. Please note that we may retain some of your information after you cease to use our services if it is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes, health and safety, or employment regulations.

When determining the relevant retention periods, we will consider:

- Our contractual obligations and rights in relation to the relevant information;
- Legal obligations under applicable law to retain data for a certain period;
- Our legitimate interest where we have carried out a balancing test;
- Statute of limitations under applicable law;
- Disputes, whether potential or actual;
- If you have made a request to have your information deleted;

- Guidelines issued by relevant data protection authorities.
- If we determine that we can delete your data, we will do so securely.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Your personal data may be shared with certain third parties who will be subject to contractual obligations of confidentiality and compliance with all relevant data protection laws, including

- Our client who has a position to fill or who you may have been placed with. Our clients are global and based in numerous industries, such as financial services.
- The end client or customer who you may be placed with through another agency or intermediary (for example where there is a managed service arrangement or where our client is a consultancy firm)
- Other recruitment agencies or service providers such as umbrella companies, RPO or PSL providers.
- Suppliers, contractors and agents who may perform services for us, including payroll providers, umbrella companies, professional advisers such as accountants or lawyers, insurance brokers, consultants, background check agencies, email marketing agencies, event organisers.
- Government or law enforcement authorities or any other third party in any jurisdiction, if we believe that we have an obligation to do so or that such action is necessary to protect, defend or enforce our rights.
- In the event of a sale, merger, liquidation, receivership or transfer of assets of Financial Careers Ltd, to any third party provided they are obliged to only use your personal data for the purposes that you have provided it to us.

We may also conduct checks on you to verify the accuracy of the information you have provided and where we do this, we may share your information with former employers or clients.

WHAT IS THE LEGAL BASIS FOR USING YOUR INFORMATION?

For prospective employees, candidates, contractors, referees and clients, our processing is necessary for our legitimate business interests in that we need the information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and referees.

If you are interviewed and submitted as a candidate, then to comply with our employment, social security or other legal and regulatory obligations, we may need to process more detailed personal data including sensitive data such as health information that you or others provide about you. Where there is no legal obligation to collect and process any of your



sensitive personal data, we always ask for your express consent before undertaking such processing.

We may also rely on our processing being necessary to perform a contract for you, if you are a client or a candidate or contractor and we are negotiating or have entered into an agreement with you to provide services to you or receive services from you.

Processing may also be necessary to fulfil our legal and regulatory obligations, such as disclosure to public authorities, regulators and investigations. We may also use your information if we must establish, exercise or defend legal claims or where the personal information is in the public domain.

WHAT HAPPENS IF YOU DO NOT PROVIDE US WITH THE INFORMATION WE REQUEST OR ASK THAT WE STOP PROCESSING YOUR INFORMATION?

If you do not provide the personal data we request or withdraw your consent, if consent is the sole lawful basis we rely on for processing your information, we may not be able to match you with available job opportunities.

DO WE MAKE ANY AUTOMATED DECISIONS CONCERNING YOU?

No, we do not carry out automated profiling as there is an element of human intervention in all our processing.

WHAT SECURITY MEASURES DO WE HAVE IN PLACE?

We have appropriate technical and organisational security measures in place to protect your personal information under our control and to prevent unauthorised access, destruction, transmission, misuse or alteration of it. However, we cannot absolutely guarantee that such unauthorised access, destruction, transmission, misuse or alteration wont ever happen.

The transfer of data via the internet is not completely secure and while we do our best to protect your personal data, any data you transmit to us is at your own risk. Once we have received your data, we will follow our procedures and policies to protect it securely.

If we share any links to external websites operated by other organisations (such as clients, training providers etc) with you, any data you submit to those websites (including clicking on any link) is outside our control and will be subject to that third party's data protection and privacy policies. We cannot guarantee that any third party will be compliant with relevant laws and best industry practice and accept no responsibility or liability for these third parties.

DO WE USE COOKIES TO COLLECT PERSONAL DATA ON YOU?

To provide better service to you on our websites, we use cookies to collect your personal data when you browse.

WHAT RIGHTS DO YOU HAVE IN RELATION TO THE DATA WE HOLD ON YOU?

By law, you have several rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. Therefore, we're providing you with the information in this Privacy Notice.

2. The right of access

You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice).

This is so you're aware and can check that we're using your information in accordance with data protection law.

3. The right to rectification

You are entitled to have your information corrected if it's inaccurate or incomplete.

4. The right to be forgotten

The right to be forgotten', in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions. Please note however that in line with applicable data protection legislation such as the GDPR, Data Protection Act 2018 and the Privacy and Electronic Communications Regulation 2003 (PECR – which regulates direct marketing activities via digital means), rather than delete all your personal information we may need to retain some of your basic personal information on an internal suppression list to respect your request and prevent any inadvertent future marketing contact.

5. The right to restrict processing

You have the right to ‘block’ or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be ‘blocked’ to make sure the restriction is respected in future.

6. The right to data portability

You have the right to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.

7. The right to object to processing

You have the right to object to certain types of processing, including processing for direct marketing or if you no longer want to be contacted with potential opportunities.

8. The right to lodge a complaint

You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator. In the UK, this is the Information Commissioner’s office (ICO) whose contact details are provided at the end of this Notice.

9. The right to withdraw consent

If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request. In the limited circumstances where we may need to do this, we will provide you with a full explanation at the time of our lawful basis for doing so along with your referral rights to lodge a complaint with the relevant data protection authority.



Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but if the request is going to take longer to deal with, we'll let you know in a timely manner.

HOW WE CONTACT YOU?

We may contact you by phone, email or via social media or networking sites. If you prefer a particular contact means over another, please just let us know.

HOW TO CONTACT US?

We will review your personal data periodically to ensure it is up to date and accurate but rely on your cooperation to keep us informed if any such data changes. If you would like to change any information you have provided to us, please just let us know.

If you are unhappy with how we've handled your information or have further questions on the processing of your personal data to: By email: info@financialcareersltd.co.uk, By tel: +44 (0) 2032862545. By post: Financial Careers Ltd 7 Bell Yard, London, England, WC2A 2JR marked for the attention of the Data Protection Office.

This Privacy Notice was last updated in March 2020. It will be reviewed from time to time to take account of any new laws to ensure it remains compliant with best practice and applicable laws. Any information we hold will be governed by the most recent version of this Privacy Policy.