



PRIVACY NOTICE FOR CANDIDATES

PraxisIFM is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during our recruitment process, in accordance with the Data Protection (Bailiwick of Guernsey) Law 2017 (the Guernsey Data Protection Law).

All organisations active in the European Union (EU) will need to comply with the General Data Protection Regulation (GDPR) in addition to local data protection law. This privacy notice is therefore designed to ensure compliance with both the Guernsey Data Protection Law and the GDPR.

It applies to all applicants during the recruitment process.

What is the purpose of this document?

PraxisIFM Group Limited, PraxisIFM Trust Limited, Praxis Fund Services Limited, PraxisIFM Treasury Services Limited, International Fund Management Limited, Praxis Central Services Limited (collectively referred to as PraxisIFM) is a “data controller”. PraxisIFM can be contacted at Sarnia House, Le Truchot, St Peter Port, Guernsey, GY1 4NA. 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 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.

In addition we must be accountable so that we are able to demonstrate compliance with the above principles.

The kind of information we hold about you

Personal data, or personal information, means any information relating to an identified or identifiable individual. It does not include data where no natural person can be identified from the data.

There are "special categories" of personal data which require a higher level of protection (Special Category Data).

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 covering letter and/or e-mail.

- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications
- Any information you provide to us during an interview.
- Test scenarios/tests as may be applicable.

We may also collect, store and use the following Special Category Data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- 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.
- The recruitment agency from which we collect the following categories of data: covering e-mail(s), CV and contact details
- Disclosure and Barring Service, or similar agency, in respect of criminal convictions.
- Your named referees (one of which should be your previous employer or last educational establishment attended), from whom we collect the following categories of data: dates of employment/study; position within which employed; capacity in which the referee is acting if not a former employer.
- Publically available information through Thomson Reuters World-Check.

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 during 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 personal details, 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, that offer will be conditional on the receipt of satisfactory: references, Police Check, World Check, confirmation of qualifications, work permit and/or residential status and the provision of your last payslip, if in employment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application we will not be able to process your application successfully.

How we use Special Category Data

We will use your Special Category Data in the following ways:

- We will use information about any medical condition/ disability to consider whether we could provide appropriate adjustments during the recruitment process and/or understand the impact on the work environment.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We envisage that we will process information about criminal convictions.

If you are offered a role, we will request information about your criminal convictions history (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to request 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 required by the Guernsey Financial Services Commission to carry out criminal record checks for those carrying out certain roles.
- Such roles require a high degree of trust and integrity since they involve dealing with client, supplier or staff matters and we would therefore require you to seek a basic disclosure of your criminal records history in those circumstances.

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 we share your personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: the recruitment agency or another entity in the Group.

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.

Transferring information outside the EU

We may transfer your personal information outside of the Bailiwick of Guernsey and the European Union, both to those jurisdictions which have been assessed as having adequate data protection standards by the European Commission including Jersey, Switzerland and New Zealand, as well as those that do not such as South Africa, Mauritius and the UAE.

Where we may transfer the personal information we collect about you to a jurisdiction without adequate protection standards, we will make sure that appropriate measures are put in place to ensure that your personal information is treated by those parties in a way that is consistent with and which respects Guernsey laws on data protection, including by using Model Clauses approved by the European Commission.

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 data privacy manager.



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 3 months after we have communicated to you our decision about whether to appoint you to a 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 our data retention procedure.

If we wish to retain your personal information on file, 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 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 data privacy manager in writing.

Right to withdraw consent

When you applied for this role, you provided 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 the data privacy manager. 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 privacy manager

We have appointed a data privacy manager 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 data privacy manager at the e-mail address indicated below.

Data protection authority

You have the right to make a complaint at any time to the Data Protection Authority, the supervisory authority for data protection issues. You can also lodge an appeal if you are not happy with the outcome of the complaint you have raised.

Contact us

If you have any queries or concerns about how we are using your personal information, you can contact:

PraxisIFM Trust Limited Praxis Central Services Limited	Dpm.ptl.guernsey@praxisifm.com
PraxisIFM Treasury Services Limited	Dpm.ptsl.guernsey@praxisifm.com
Praxis Fund Services Limited	Dpm.pfs.guernsey@praxisifm.com
International Fund Management Limited	Dpm.ifm.guernsey@praxisifm.com
Trireme Pension Services (Guernsey) Limited	Dpm.guernsey@triremepensions.com