

Data Protection: Candidate Privacy Notice

1 WHY DO WE HAVE THIS NOTICE?

LGT Wealth Management UK LLP, LGT Wealth Management US Limited and LGT Wealth Management Jersey Limited are collectively referred to as "LGT Wealth Management" in this notice. LGT Wealth Management is a **data controller** and is responsible for processing personal information about you. You are reading this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It aims to make you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and for how long it will usually be retained.

We are committed to complying with data protection law and have appointed a Data Protection Officer (DPO) to oversee compliance with it.

If you have any questions about this policy, please contact our Data Protection Officer (DPO) as applicable:

UK: Barbara Kane (Head of Compliance and Legal)

2 Jersey: Simon Boyle (Compliance Director)

WHAT INFORMATION MIGHT WE HOLD ABOUT YOU?

In connection with your application for work with us, we may collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your CV and covering letter.
- Any information that you or, if applicable, your recruitment agency, provide to us; for example, current or most recently salary, reason for leaving your current or most recent employer, gender, contact details and marital status.
- Any information you provide to us before or during an interview.
- Any information we may collect as part of our assessment process, for example, test results.

We may also collect, store and use the following special categories of more sensitive personal information (Special Categories):

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition and/or disability, health and sickness records.
- Information about criminal convictions and offences.

3 HOW IS THIS INFORMATION COLLECTED?

We collect personal information about you from the following sources:

- You, the candidate.

- Recruitment agency, from which we collect the following categories of data: CV, contact details, salary information.
- MS Teams, where we decide we would like to interview you virtually as part of our interview process, your interview may be recorded.
- A background check provider, from which we collect the following categories of data when you have been offered a role with us and which requires your express consent to process:
 - Criminal record and credit history.
 - From named referees, confirmation of your employment dates and roles and as appropriate, a personal reference to cover any gaps dating back 5 or 10 years (depending on the role).
 - Regulatory and professional qualifications, including confirmation that a Disqualification Directive has not been issued to you and that, if applicable, Approved Person status has been maintained throughout your employment to date, as appropriate for your role.

4 **HOW DO WE USE THIS INFORMATION?**

We may use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the position.
- 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 and to process your personal information to make this decision. We are also permitted to process this information to take steps prior to entering into any potential contractual agreement with you.

5 **HOW DO WE USE YOUR SPECIAL CATEGORIES OF PERSONAL INFORMATION?**

We may use your Special Categories of personal information in the following ways (to comply with our legal obligations and/ or to monitor equality issues):

- We may use information about your disability status or religious beliefs to consider whether we need to provide appropriate adjustments during the recruitment process.
- We may 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.

6 **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 have offered a role to you. The offer is 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 Financial Conduct Authority to carry out criminal record checks for those carrying out a regulated client advisory role.
- Furthermore, LGT Wealth Management believes that in line with best practice in our industry, it is appropriate to ensure all roles are subject to criminal record checks.

We have in place an appropriate policy document and safeguards, which we are required by law to maintain when processing such data.

7 **DATA SHARING**

We will only share your personal information with our background check provider for the purposes of processing your application. 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.

8 **DATA SECURITY**

We have put in place appropriate technical and organisational security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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.

9 **DATA RETENTION**

If you apply for a job and your application is successful, your data may be used in connection with your employment and in line with our employment data protection policies. If you apply for a job and your application is unsuccessful (or you withdraw from the process or decline our offer) we will retain your information for a period after your application. After this period, we will, to the extent practicable, securely destroy your personal information in accordance with our data retention provisions.

We retain this information for various reasons, including the possibility that we face a legal challenge in respect of a recruitment decision, to consider you for other current or future jobs and to help us better understand, analyse and improve our recruitment processes. If you do not want us to retain your information for consideration for other roles, or want us to update it, please contact the Human resources team. Please note, however, that we may retain some information if required by law or as necessary to protect ourselves from legal claims.

10 **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

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.
- **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 wish to exercise any of these rights, please contact a member of the Human Resources team.

11 QUESTIONS AND COMPLAINTS

If you have any questions about this privacy notice or how we handle your personal information, please contact the relevant Data Protection Officer, Barbara Kane at barbara.kane@lgt.com or Simon Boyle at simon.boyle@lgt.com as appropriate. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), which is the UK's supervisory authority for data protection issues, or to the Office of the Information Commissioner (OIC), which is Jersey's supervisory authority for data protection issues.