

CANDIDATE PRIVACY NOTICE

WHAT IS THE PURPOSE OF THIS DOCUMENT?

IAG is a "data controller". 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 to work with us (whether as an employee, worker 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 the Data Protection (Guernsey) Law, 2017 (referred to in this notice as "the Law")

Principal Contact: Anne-Marie Aylward HR Manager aaylward@iag.co.gg

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.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application to 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 any covering letter, directly or through a Recruitment Agency.
- Any information you may have provided on an application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- 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 acting on your behalf.
- Channel Islands Data Service Limited a credit reference agency.
- Guernsey Police in respect of criminal convictions.
- Your named referees.
- Data from third parties from a publicly accessible sources.

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 employment
- Carry out background and reference checks, where applicable.
- 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 to any role within our employ since it would be beneficial to our business to appoint someone to such a role.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV, whether directly or via a Recruitment Agency, any covering letter **OR** application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. We will decide whether to invite you for an interview. We will use the information you provide to us at the interview or beforehand to decide whether to offer you employment. If we decide to offer you employment we will then take up references, await a criminal record disclosure and a credit agency check. Any offer of employment is subject to these checks.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during your interview or thereafter.
- 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 any.

We are required to ascertain from a criminal records check that we are satisfied that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the Guernsey Financial Services Commission to carry out criminal record checks for those employed in the financial services sector.
- The role requires a high degree of trust and integrity since it involves dealing with client investments and monies consequently we would like to ask you to seek a basic disclosure of your criminal records history.

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

AUTOMATED DECISION-MAKING

You have the right not to be subject to decisions based on automatic processing. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

DATA SHARING

We will only share your personal information with the following third parties for the purposes of processing your application:

Channel Island Data Services Limited
Your referees
The Guernsey Police

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.

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.

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

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to employ you. 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 applicable laws and regulations. If you accept an offer of employment with us, you will be provided with a new Privacy Notice related to the processing of your personal data which will supersede and replace this Notice.

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 of one year on that basis.

YOUR RIGHTS INCLUDING 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.
- **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.
- **Notification** as to the identity of any person to whom we have disclosed your information. This right arises when you have required us to rectify, erase or restrict processing your information. Before lifting or otherwise ceasing a restriction on your processing, you are entitled to be notified that it is going to happen.
- **Request the transfer** of your personal information to another party.
- **Object to processing** where processing is on the grounds of public interest, or for historical or scientific purposes. We do will process your information on such grounds.
- **Complain to the Data Protection Commissioner** (DPC) in Guernsey about how we have handled your data. You also have a rights of appeal in relation to certain actions or decisions of the DPC.

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 Nigel Corbin, Compliance Officer in writing or by email to ncorbin@iag.co.gg

RIGHT TO WITHDRAW CONSENT

When you sign the acknowledgement below, you are providing 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 Nigel Corbin (details above). 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.

I, _____ (candidate name), acknowledge that on _____(date), I received a copy of IAG Candidate Privacy Notice and that I have read and understood it. I hereby provide my consent to IAG to process my personal data as described in this Notice.

Signature: _____

Date: _____