

# Job applicant privacy notice

## Emso Asset Management Limited

**Data controller:** Emso Asset Management Limited (the 'Company')

**Data protection lead contact email:** [dataprotection@emso.com](mailto:dataprotection@emso.com)

As part of our recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations under the General Data Protection Regulation ("GDPR") and the Data Protection Act (1998).

This privacy notice applies to all job applicants and is non-contractual.

### What information does the Company collect about you?

The Company collects a range of information about you, such as:

- Your name, address, telephone number, and personal email address;
- Personal information included in a CV/Resume, cover letter, or interview notes;
- Such personal information as may be contained in references;
- Information about your right to work in the UK, and copies of proof of right to work documentation;
- Copies of qualification certificates;
- Details of your skills, qualifications, experience and work history with previous employers;
- Your professional membership(s).

The Company may collect this information in many ways. For example, data might be contained in your CV/resume, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The Company will also collect personal data about you from third parties, such as employment verification supplied by former employers, information from employment background screening providers, and information from criminal records checks from the Disclosure and Barring Service (DBS). The Company will seek information from third parties only once a job offer has been extended to you and will inform you that it is doing so.

Your personal information will be stored in different places, including on your application record, in the Company's HR management systems and on other IT systems, such as e-mail and/or hard copies.

### Why does the Company process personal data?

The Company may process personal data when it takes steps in contemplation of entering into a contract with you. It also needs to process your personal data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment can start.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company to manage the recruitment process,



assess and confirm a candidate's suitability for employment, and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to, and defend against, legal claims.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Company processes other special categories such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The personal data you provide as part of the recruitment process will only be held and processed to facilitate the selection process and in connection with any subsequent employment. The Company may keep your personal data on file, if you consent in writing, for consideration in respect of any suitable employment opportunities that may arise. We will seek your consent before doing so and you are free to withdraw your consent at any time by notifying us in writing.

#### Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes: members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company may then share your data with employment background check providers to obtain background information and the Disclosure and Barring Service to obtain criminal records information as appropriate. We may also then share your information with third party service providers including: the benefits broker, external payroll bureau, pension services provider, and any other relevant service provider engaged by the Company.

#### How does the Company protect data?

The Company takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Data may be stored securely on electronic devices or held in paper form in secure cabinets. Your personal data will be shared internally with other individuals and/or departments where necessary for processing purposes.

#### For how long does the Company keep data?

If your application for employment is unsuccessful, the Company will hold your data on file for a maximum of three (3) months after the end of the relevant recruitment process.

Only where specifically requested by the Company and, if you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further six (6) months for consideration for future employment opportunities that may arise. At the end of that period, or once you withdraw your consent, your data will be deleted or destroyed.



If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in the Company's Staff Privacy Notice.

#### Your rights in connection with your personal data

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you may

- Request access to your personal data;
- Request correction of personal data that we hold about you;
- Request the erasure of your personal data;
- Restrict the processing of your personal data;
- Object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- Request portability of your personal data. In certain circumstances, you may have the right to require that we provide you with an electronic copy of your personal data either for your own use or so that you can share it with another organisation. Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the other party.

If you would like to exercise any of these rights, please contact our **data protection lead** at: [dataprotection@emso.com](mailto:dataprotection@emso.com)

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

#### What if you do not provide personal data?

If you do not provide certain personal information when requested, we may not be able to process your job application properly, or at all. We may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory rights.

#### Transferring personal information outside the European Economic Area

In order to operate in various jurisdictions, it may be necessary to process and transfer an applicant's data outside of the European Economic Area (EEA) so that this is available to the line managers and staff involved in the recruitment process in non-EEA locations.

The Company maintains data sharing agreements with entities in third countries to help protect any personal data so transferred.

#### Automated decision-making

We do not envisage that the Company will use your personal data in any automated decision-making processes, including profiling.



### Changes to this privacy notice

The Company reserves the right to update or amend this privacy notice at any time. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

### Contact

For enquiries, please send an email to **[dataprotection@emso.com](mailto:dataprotection@emso.com)** or, if you prefer, send a letter Emso Asset Management Limited at Iron Trades House, 21 Grosvenor Place, London SW1X 7HN.