

# Candidate privacy notice

## For Canaccord Genuity Wealth Limited

In this notice, 'UK CGWM', 'we', 'us', 'Company' and 'our' means Canaccord Genuity Wealth Limited and Canaccord Genuity Financial Planning Limited. We are registered in the UK and our registered address is 41 Lothbury, London, EC2R 7AE and the company registration numbers are 03739694 and 02762351 respectively.

This notice is issued in accordance with the General Data Protection Regulation EU 2016/679 (GDPR) with effect from 25 May 2018.

### Introduction

As part of our candidate application and recruitment process CGWM (the 'Company') collects, processes and stores personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application and assessment. This document sets out:

- Why we collect your personal information;
- What information is collected and;
- How it is processed within the recruitment process.

Please take the time to read and understand this privacy notice.

Throughout this notice we use the term 'processing' to cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.

### Why do we collect your personal information?

In order to manage your application, we need to process certain personal information about you. The purposes for this are set out below. We only process your information as necessary for the purposes of progressing your application or as required by law or

regulatory requirements, so not all of the purposes set out below will apply to you all of the time.

- **Application:** CV, name, address, employment history, academic and professional qualifications, age, diversity (i.e. gender, ethnicity, disability, sexual orientation), nationality, previous disciplinary matters;
- **Assessment:** CV, psychometric tests (such as a situational judgement test, ability or personality test), interview (face to face, telephone or video), behavioural assessments (such as a role play, group exercise or presentation), technical assessments;

### What personal information might we process?

Here are some examples of the type of information we may process:

- Personal details such as name, address, date and place of birth;
- Employment history such as previous employers, positions, dates;
- Compensation information including basic salary, benefits, bonuses;
- Education history including qualifications (both academic and professional) and skills;
- Photographs and images from recorded assessments or from on site CCTV; and
- Assessment results e.g. psychometric assessment results, video or telephone assessment.

During the process we may also capture some sensitive personal data about you (e.g. disability information). We do this in order to make reasonable adjustments to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting at the Company (if successful) and to ensure that we comply with our legal obligations with regard to our hiring.

### Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- To consider your application (including, in some cases, verifying your qualifications and references with those third parties you name);
- To make reasonable adjustments in the recruitment process for disability;
- To maintain consistent practices and procedures with respect to recruitment, including the performance of human resources and other functions;
- To meet our legal and regulatory obligations; and
- To process your personal information for the purposes of equal opportunities monitoring.

We are entitled to use your personal data in these ways because:

- We need to in order to take steps in preparation for entering into a contract with you, in particular to consider you for a position with us;
- We have legal and regulatory obligations that we have to discharge;
- We may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and/or
- The use of your personal data as described is necessary for our legitimate business interests, such as:
  - Allowing us to effectively assess your skills, qualifications and/or the strength and merits of your application and your suitability for the role applied for;
  - Allowing us to effectively verify your information;
  - Allowing us to effectively and efficiently administer and manage the operation of our business;

- Ensuring a consistent approach to the recruitment; or
- Being able to contact you in relation to your application and the recruitment process.

Please note, if your application is successful and you are subsequently offered and accept employment with us, the information we collect during the application and recruitment process will become part of your employment record.

## Who do we share your personal information with?

The Company will need to share your personal information internally (both in the country where you may work and in other countries in which we have central operations) and may need to share it with some external parties or associates of the Company. Your information will only be shared if it is necessary or required.

The recruitment process will involve:

- Assessing and progressing your application; and
- Assessing your suitability (skills, strengths, behaviours for the role).

To enable these processes your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your personal information may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf;
- Employees in HR who have responsibility for certain HR processes (for example recruitment and assessment); and
- Security/office managers for facilities / premises.

The Company may also need to share your information with certain external third parties including:

- Companies who provide candidate interview and assessment services to the Company, for example recruitment agencies;
- Other third-party suppliers (or potential suppliers), who provide services on our behalf.

These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this notice.

As a global organisation, the personal data that we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by individuals operating outside of the EEA who work for a CG Company or for one of our suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- The country that we send the data to might be approved by the European Commission as offering a sufficient level of protection (through an adequacy decision);
- The recipient might have signed up to a contract based on 'model contractual clauses' approved by the European Commission, obliging them to protect your personal data; or
- Where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

## How do we protect your information?

Our HR and Recruitment systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur. This is done in accordance with the CG Company Security Policy.

## For how long will we hold your personal data?

How long we hold your personal data for will vary. The retention period will be determined by the following criteria:

- The purpose for which we are using your personal data – we will need to keep the data for as long as is necessary for that purpose; and
- Legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

If the Company has received your information for an application, speculative or otherwise and you have been unsuccessful in your application, your information will be held for 6 months after the date your application was deemed unsuccessful. The information will be destroyed once this time has elapsed.

## Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- The right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- The right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- The right to request that we rectify your personal data if it is inaccurate or incomplete;
- The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- The right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

If you wish to exercise these rights or you have any queries about your personal data, please contact the HR team on [cgwmhr@canaccord.com](mailto:cgwmhr@canaccord.com). You can find out more information about your rights by contacting the data protection regulator in your jurisdiction, the Information Commissioner's Office, or by searching their website at [www.ico.org.uk](http://www.ico.org.uk).

As this document is updated, the current versions will be posted on this site.