

As part of our recruitment process, the Industrial and Commercial Bank of China (ICBC) collects and processes personal data relating to job applicants. The Bank is committed to being transparent about how it collects and uses this data and to meeting its protection obligations.

(ICBC) respects your privacy. This notice contains information on (amongst others):

- what personal information we collect (see section 1);
- what we do with that information (see section 2);
- who we share the information with (see section 3); and
- what rights you have (see section 6).

ICBC (London) plc (“**ICBC**”, “Bank” “**we**”, “**our**”, or “**us**”) will collect and process personal information about you. By “**you**”, we mean prospective employees, contractors and agency staff.

This notice is not contractual.

## 1 The types of personal information we collect

We hold the following information about you in order to carry out the activities set out above:

- **Basic biographical details:** This includes your name, age, gender, date of birth, photograph, home address, personal telephone number, marital status, and copies of identity documents. Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process
- **Work information:** Details of your qualifications, skills, experience, employment history and references. Information about your current level of remuneration, including benefits entitlements and about your entitlement to work in the UK
- **Other information generated:** This includes communications and other documents that are created, and CCTV footage if you visit our premises.

ICBC may collect this information in a variety of ways. For example, data might be contained in CVs, obtained from your passport or other identity documents or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as recruitment agencies and from references supplied by former employers. We will seek information from third parties only after a job offer has made and we will inform you that we are doing so.

Data will be stored in a range of different places, including on your employee file, in ADP Freedom system and in other IT systems (including emails). In the majority of cases, the provision of this information is mandatory, but we will let you know where the provision of this information is optional.

## 2 Using your personal information for certain purposes and the legal basis for processing

We use your information for the following purposes:

## 2.1 Pre-contractual steps

We will use your information to perform our contractual obligations towards you or to take pre-contractual steps at your request, such as preparing a contract of employment for you following a decision to make you an offer of employment.

We will use your information where necessary to comply with the legal obligations placed upon us. This means we will use your information to:

- confirm that you are entitled to work in the United Kingdom;
- keep records necessary to demonstrate our compliance with our compliance obligations, e.g. in relation to bribery; and
- disclose your information where we are under a legal obligation to do so.

## 2.2 To manage and protect our business

We will use your information where we have a legitimate interest in managing and protecting our business (including preventing or detecting crime and fraud), and have taken measures to ensure that this does not cause unwarranted prejudice to your privacy. This means we will:

- to determine whether your skills and experience are suitable for the role you are applying for, and determine whether or not to make an offer of employment to you; and,
- at the appropriate stage in the recruitment process, to verify the accuracy of information you have provided to us as part of your application, including through background screening

## 3 Sharing your personal information

We will disclose your information in the circumstances set out below.

### 3.1 Internally

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

### 3.2 To the ICBC group

We will disclose your information to other members of the ICBC Group where there is a legitimate need for those other group members to access that information and when they provide services to us. Some of those Group members are based outside of the European Economic Area in jurisdictions that do not provide an adequate level of protection for personal information. See section 5 for more information on international transfers.

### 3.3 To third party service providers and our customers

We will disclose your information to third parties who provide us with services, including third parties who supply us with services to help run our business, and professional advisers, such as lawyers or accountants. For example, we disclose personal information

to Verifile, who provide us with CV Verification and background screening. Where we disclose information to our service providers we take reasonable steps to ensure that it continues to be properly protected.

### **3.4 In accordance with the law**

We will disclose your information where we are under a legal obligation to do so, e.g. because a law obliges us to disclose that information or we have to disclose it as part of a legal claim. We will also disclose your information where there is substantial public interest, and the disclosure is necessary and proportionate. For example, we will share your information with tax authorities.

## **4 Storing your personal information**

If your application for employment is unsuccessful, the organisation will hold your data in file for 6 (six) months after the end of relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 6 (six) months for consideration for further employment opportunities. At the end of this period, or when you withdraw your consent, your data is deleted or destroyed. You will be asked when you submit your CV whether you give us consent to hold your details for the full 12 months to be considered for other positions during this period. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Employee File (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

We will keep other information about you for the periods necessary for the purposes for which the information is used. We will keep the information for a longer period where required by law.

## **5 Transferring your personal information internationally**

Data protection laws in the European Economic Area (EEA) require additional compliance steps for sending personal information abroad. These compliance steps help ensure that the same level of protection is applied to personal information once it leaves the EEA.

We require such recipients to comply with appropriate measures designed to protect personal information contained within a binding legal agreement. A copy of these measures can be obtained by contacting us at the address at the end of this notice.

## **6 Your data protection rights**

You have the data protection rights listed below. ICBC will consider requests to exercise these rights under applicable data protection laws, but these rights are not absolute: they do not always apply and exemptions may be engaged.

As a data subject, you have a number of rights, You can:

- Access your information: If you want to access and obtain a copy of your information we hold about you, please use the contact details below.
- Correct your information: if you require the Bank to change incorrect or incomplete information we hold about you, please use the contact details below.

- Concerned about our use of your information: You can, in certain circumstances, ask us to stop using your information, or to delete your information. In some cases, we may need to continue to hold and use your information, even if you ask us not to; for example, where we are under a legal obligation to retain that information. However, if we are not able to comply with your request, we will tell you why.

## **7 Exercising your data protection rights; complaints**

If you would like to speak to us about how we use your personal information, you can do this by contacting us at the details at the end of this notice.

If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office. Their details are available at [www.ico.org.uk](http://www.ico.org.uk).

## **8 Status of this privacy notice**

This notice was last updated in May 2018. We reserve the right to update it from time to time. If we update the notice, we will take steps to inform you of the update by appropriate means.

**9 Contact information**

If you would like any more information, or would like to exercise any of the rights set out above, contact us at:

ICBC London (plc)  
81 King William Street  
London  
EC4N 7BG

<b>How to contact us:</b>	
Call	From the UK: 020 7397 8888 From Overseas: +44 20 7397 8888
Visit us	ICBC (London) plc 81 King William Street London EC4N 7BG  Our business hours: Monday-Friday 9.30 – 4pm.
Write to us	Human Resources & Administration Department ICBC (London) plc 81 King William Street London EC4N 7BG
Email us	<<privacy1@icbclondon.com>>