

Candidate Data Privacy Notice

January 2023



ICBC Standard Bank Plc and its subsidiary companies and branches: Candidate Data privacy notice

What is the purpose of this document?

For candidates, ICBC Standard Bank Plc (or its applicable branch or subsidiary, if you are applying for a role in Asia or New York) (ICBCS) will be the controller of your data. This means that we are responsible for deciding how we hold and use personal data about you in connection with the recruitment process. This concept also applies to our other international locations. Therefore, you are being provided with a copy of this privacy notice because you are applying for work with us (whether as an employee, agency worker or contractor). It makes you aware of how and why your personal information will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

This notice was updated in January 2023.

Data Protection Principles

We will comply with applicable privacy or data protection law and principles, such as the EU GDPR, the Data Protection Act 2018, where UK law applies, the Singapore Data Protection Act, where applicable, or the Shield Act 2020 in the US and 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 (you will need to let us know if the information you provided to us has changed).
- 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 for work with us or, as applicable, the submission of your CV (together with any other applicable data) on a speculative basis, or in relation to any offer of employment or work we will collect, store, and use the following categories of personal data about you:

- The information you have provided to us in your CV, application form and/or any additional documentation provided.
- Any information you provide to us during an interview or at other times during the recruitment process, (including without limitation any information you provide to us about any Court Judgment, any connection with a Politically Exposed Person, and language skills).
- Any other information included as part of the application process such as, if/where applicable, any psychometric or other test/assessment results.
- Where applicable, information connected with pre-employment screening and right to work checks (which may include referral details, visa status and nationality).
- In some jurisdictions (but not, for the avoidance of doubt in the US) we may collect salary and compensation data.

We may also collect, store and use the following “special categories” of more sensitive personal data:

- Information about your race or ethnicity or disability status (not, for the avoidance of doubt, in the US).
- Information about your health, including any medical condition, health and sickness records (not, for the avoidance of doubt, in the US).
- Information about criminal convictions.

How is your personal data collected?

We collect personal data about candidates from the following sources:

- You, the candidate.
- Where applicable, your recruitment agency, from which we collect the following categories of data: CV, contact details, and remuneration (though not in the US) and, where applicable (but not, for the avoidance of doubt, in the US), benefits information.
- Where applicable and where you have agreed to this, from a current staff member of ICBCS, from whom we collect the following categories of data: CV and contact details.
- Where applicable, publicly available sources such as job boards.
- Where applicable and if/where permitted under local legislation, our or a recruitment agency’s background check/pre-employment screening provider, from which we or the agency may collect the following categories of data: proof of identity; ID verification; address check/search; employment history and verification (including gaps in employment); financial probity/credit information; CV check; verification of qualifications; directorship information; sanctions and anti-money laundering check information; media and internet search information including social media; politically exposed person status; financial regulator search; references; professional memberships; and criminal convictions check.
- Your named referees, from whom we or a recruitment agency may collect the following categories of data: employment verification and regulatory references (if/where applicable), together with any other information provided in references.
- The following data from third parties may, where applicable, be from (or partly from) a publicly accessible source: media and internet check; directorship check; credit check; sanctions and money laundering check; politically exposed person status; financial regulator search; and professional memberships

How we will use information about you

We will/may use the personal data we collect about you to/for:

- Assess your skills, qualifications, and suitability for the role you are applying for (where applicable), or, where your CV is held in our database, for an available role.
- Carry out background and reference checks, where applicable.
- Consider right to work eligibility, where applicable.
- Communicate with you about the recruitment process or, where your CV is held in our database, about a potential role.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Equal opportunities monitoring.

It is also in our legitimate interests to decide whether to appoint you to a role you have applied for.

Having received your CV and any other information provided as above and the results from any applicable tests, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether you should be offered the role. If we decide you should be offered the role, we or the applicable recruitment agency will then, normally via our or their screening provider, take up references and, where applicable and where permitted under local legislation, carry out a criminal record check and carry out other background checks (proof of identity; address check; employment history and verification; financial probity/credit information; CV check; verification of qualifications; directorship information; sanctions and anti-money laundering check information; media and internet search information; politically exposed person status; financial regulator search; references; professional memberships) before your appointment is confirmed (or in some cases, these checks may be carried out or commenced prior to an offer being made). We or the applicable recruitment agency will also, where applicable, use the information you provide to us to check your right to work in the applicable jurisdiction and/or to apply for a work permit or visa, as applicable.

We would also like to retain your personal data in our database for a fixed period, on the basis that an opportunity or further opportunity (as applicable) may arise in future and we may wish to consider you for that.

If you don't provide personal data

If you don't 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 (where legally permitted) or references for a role and you fail to provide us or the applicable recruitment agency with relevant details, we will not be able to take your application further.

How we use your sensitive personal data

We will use your sensitive personal data in the following ways:

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

Information about criminal convictions

We envisage that we may process information about criminal convictions.

We will, where applicable, collect information about your criminal convictions history if you accept an offer of a role or, in some circumstances, if a role is to be offered to you (in all cases, your offer will be conditional on checks and any other conditions, such as references, being satisfactory and, where applicable, conditional on regulatory approval and/or ICBCS being satisfied of your fitness and propriety). Dependent on any role you are applying for, we or the applicable recruitment agency may be required or entitled to carry out a criminal record 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 required by the Financial Conduct Authority and/or the Prudential Regulatory Authority/ MAS / FINRA or other applicable regulator to carry out criminal record checks for those carrying out Senior Manager Function or other applicable regulatory roles.

- Senior Manager Function roles are eligible for a standard check from the Disclosure and Barring Service, where applicable.
- Other roles within ICBCS require a high degree of trust and integrity in light of our regulatory requirements and the type of work involved and so, where applicable, we would like to ask you to seek a basic disclosure of your criminal records history or, dependant on jurisdiction a conduct or criminal records check will be carried out.
- We have in place appropriate policy/procedure document/s and safeguards in respect of our processing of such data.

Automated decision-making

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

Data Sharing

Why might you share my personal data with third parties?

We will only share your personal data with the following third parties for the purposes of processing your application: employment agency, search consultancy, immigration, background screening provider (where applicable) and other entities or branches in our group. All our third-party service providers and other entities in our group are required to take appropriate security measures to protect your personal data in line with our policies. We only permit third party service providers to process your personal information for specified purposes and in accordance with our instructions. Other entities or branches in our group may also have access to your data since the recruitment system we use is a global one.

Transferring information to other jurisdictions including, for UK-based candidates, outside the EU

Other entities or branches in our group based in other jurisdictions including London, Singapore and New York may have access to your data via the shared global recruitment system, although, aside from this, the other entities or branches would not view or process any of your data.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from dataprotectionofficer@ICBCStandard.com

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

How long will you use my information for?

We will retain your personal data for six months after our decision about whether to appoint you to any role has been communicated to you (or if earlier, six months after any such role is filled). We retain your personal data 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 the recruitment exercise has been conducted in a fair and transparent way.

Subject to the paragraph above, we will also retain your personal data for a period of two years (or up to two years if applicable) after your CV is first provided to us on the basis that an opportunity (or further opportunity) may arise in future for which we may wish to consider you. You can request for your personal data to be deleted at any time, in which case the period of two years will be reduced accordingly.

After the applicable period as above, we will securely destroy your personal data in accordance with our records management policy. If you would like to view this policy, please email our Data Protection Officer at dataprotectionofficer@icbcstandard.com

Rights of access, correction, erasure, and restriction

Your rights in connection with personal data collected as part of recruitment exercise

Under certain circumstances, including where applicable in the particular jurisdiction (these rights do not apply in the US and may not apply in other jurisdictions), by law you have the right to:

- **Request access** to your personal data (known as a “data subject access request” where UK law applies). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data 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 data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data 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 data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact dataprotectionofficer@icbcstandard.com.

Right to withdraw consent

When you applied for a role or agreed to the submission of your CV (and any other applicable data), you provided consent to us processing your personal data for the purposes of the recruitment exercise (if applicable) and to the retention of your CV (and any other applicable data) on our database for a fixed period. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact dataprotectionofficer@icbcstandard.com. Once we have received notification that you have withdrawn your consent, we will no longer process your application or retain your CV/other data and, subject to our record retention policy, we will dispose of your personal data securely.

Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO (dataprotectionofficer@icbcstandard.com). Where UK law applies, you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Where applicable, in other jurisdictions, you may complain to any other applicable supervisory authority for your jurisdiction for data protection issues.

I have read and understood this Privacy Notice. Where I am submitting my CV on a speculative basis or in addition to my application for a specific role, I understand that I can ask for my CV (and any other applicable

data) to be removed from your database at any time but that otherwise this data will be held for a fixed period as set out in this Notice.

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ICBC Standard Bank Plc | Financial Markets and Commodities
20 Gresham Street | London EC2V 7JE, United Kingdom

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