

JTC RECRUITMENT DATA PROTECTION PRIVACY NOTICE

Your privacy is important to us at JTC. This privacy notice explains what personal data JTC collects from you either directly or through our interactions with you and how we use that data. Please read the following to learn more about how we collect, store, use and disclose your personal information within Human Resources (HR).

This privacy notice covers our handling of information that we gather from you during recruitment. Within HR, we collect various types of information, including information that identifies you as an individual (“Personally Identifiable Information”) and special category data, both of which are detailed below.

1 INITIAL STAGE OF RECRUITMENT – CANDIDATE APPLICATION

All information collected in the candidate application process is detailed below. The below information is used to determine the career history for the candidate and their experience and expectations against the vacancy, the legality around their right to live and work in the jurisdiction in which the recruitment is occurring (to ascertain if the individual meets the local legislative requirements or if further consideration will need to be given to provide a work permit/licence) as well as details for how to contact the candidate.

For successful candidates, please refer to the ‘HR Data Retention Document’ for details regarding employee data retention periods. For candidates who are unsuccessful, the below personal details will be stored for 6 months following the date of application and then removed.

While JTC requests a covering letter and Curriculum Vitae (CV) to provide insight into the above, JTC has no control over the information a candidate wishes to submit as part of their application and therefore the individual provides the information as a choice to JTC. JTC will treat all information contained within the CV and covering letter as strictly confidential and in line with data protection legislation and best practice.

PERSONAL DATA COLLECTED	LEGAL BASIS FOR PROCESSING	INTENDED RECIPIENTS	STANDARD RETENTION PERIODS
First Name	Legal Obligation & To prepare a contract	HR Group Resourcer (HR), Hiring Lead	For successful candidates: Employment Duration. For unsuccessful candidates: 6 months.
Last Name	Legal Obligation & To prepare a contract	HR Group Resourcer (HR), Hiring Lead	
Email address	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	
Jurisdiction	Legal Obligation	HR Group Resourcer (HR), Hiring Lead	
Right to Work/residential status	Legal Obligation	HR Group Resourcer (HR), Hiring Lead	
Salary Information	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	

Professional Qualification (where applicable)	Legal Obligation and Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	
CV	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	
Covering Letter	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	

2 SECOND STAGE OF RECRUITMENT – CANDIDATE ASSESSMENT

Following candidate shortlisting, candidates will be invited to attend interviews with HR and the hiring lead. Please refer to clause 1 the initial stage of recruitment, for information around retention periods for unsuccessful candidates. For all successful candidates, this information will be retained throughout the duration of their employment and in line with statutory requirements.

All information directly requested in the candidate assessment process is detailed below. The below information is used to determine which candidate has the most applicable and transferrable expertise and subsequently would best suit the role as well as JTC as a company.

During the assessment process, candidates will be asked set interview questions which contain personal information around previous job history and salary which all support the recruitment decision. JTC cannot directly control all of the information shared at this stage by the candidate, however all information obtained through this process will be treated as strictly confidential and in line with data protection legislation and best practice.

PERSONAL DATA COLLECTED	LEGAL BASIS FOR PROCESSING	INTENDED RECIPIENTS	STANDARD RETENTION PERIODS
Salary and Benefits Information (current & expectations)	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	For successful candidates: Employment Duration. For unsuccessful candidates: 6 months.
Professional Qualification Status & Costs	Legal Obligation & Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	
Motivations for Application, job role	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	
Working experience (in depth)	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	

Behavioural Questions (team working, communication style)	Legitimate Interest	HR Group Resourcer (HR), Hiring Lead	
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3 FINAL STAGE OF RECRUITMENT – CANDIDATE PRE-SCREENING

Following the assessment process, the successful candidate will be offered a role with JTC and in order to prepare the pre-screening requirements and contract of employment the following information is requested.

The below information is used for world check, identity verifications, as well as, to finalise the offer of employment and prepare the contract of employment.

PERSONAL DATA COLLECTED	LEGAL BASIS FOR PROCESSING	USAGE FOR DATA	INTENDED RECIPIENTS
Salary with new role	To prepare a contract	Required as a core part of contract of employment	HR, Finance, 3 rd party payroll services
Job Title & Level	To prepare a contract	Required as a core part of contract of employment	HR, IT, Risk & Compliance, BD and Marketing
Address & Postcode	To prepare a contract	Required for World Check and to complete the employee contract	HR, Risk & Compliance, 3 rd party healthcare providers, 3 rd party payroll services.
Date of Birth	To prepare a contract	Required for World Check, to complete the employee contract and to provide to pension / healthcare provider for statutory entitlements	HR, Risk & Compliance, 3 rd party healthcare providers, 3 rd party dental cover provider, 3 rd party payroll services, pension providers, Group life insurance provider, Work permit submission, internal HR Reports
Previous Names	Legitimate Interest	Required for world check and data verifications	HR, Risk & Compliance (broader organisation where the name change occurs during employment)
Nationality	Legitimate Interest & To prepare a contract	Required for world check and data verifications. Legal requirement for reporting in certain jurisdictions	HR, Risk & Compliance, 3 rd party pension providers, Group life insurance provider, work permit submission,



Educational achievements (exams, grades, achievement dates) – Inc. certificates	Legitimate Interest	Verification of educational achievements and relevant educational studies to the role	HR, Hiring lead, work permit submissions
Professional qualifications – current study or completed – Inc. certificates	Legitimate Interest & Legal Obligation	Verification of professional qualifications as stated in the interview process, this will impact on suitability for the role and Financial services commission requirements. Current study to see take on costs for JTC, should this be agreed	HR, Risk & Compliance, Internal Board reports, Finance (current study, take on costs)
Membership of licenced body/ membership number and joining date	Legitimate Interest	Verification of professional memberships as this may impact on suitability for the role and Financial services commission requirements.	HR, Risk & Compliance, Internal Board reports, Finance
Language Skills (not mandatory)	Legitimate Interest	Where employee wants to state (not compulsory). Supports with whether the employee can be used to translate with international clients and documentation	HR
Right to work & status	Legal obligation	To ensure the employee is legally allowed to work in the jurisdiction in which JTC will be employing them	HR
Bank Account Details	Legitimate Interest & To prepare a contract	To enable JTC to pay the employee as agreed in the contract of employment.	HR, 3 rd party payroll providers, CFO, CIO
Emergency Contact Details	Vital Interest & Legitimate Interest	To enable JTC to have relevant contact details of a next of kin in an emergency scenario.	HR, line manager/ first aider (in the case of emergency)
Pending and unspent criminal convictions (relating to Financial Services Industry)	Legitimate Interest & Legal Obligation	JTC need to know any unspent/ current convictions and what they are for given JTC is a registered financial services business and has regulatory requirements. This information will be shared with Risk & Compliance if required.	HR, (Risk & Compliance, Group Counsel, COO and Group Board – if appropriate)
Shareholder, trustee or director responsibility	Legal Obligation & Legitimate Interest	Stated as a criteria for declaration in Handbook to review any conflicts of interest with other responsibilities and to understand any time off requirements needed by the	HR (Risk & Compliance, Group Counsel, COO and Group Board – if appropriate)

in any business		employee and whether JTC are still able to employ the individual.	
Conflict of Interest	Legal Obligation	Stated as a criteria for declaration in Handbook to review any conflicts of interest with other responsibilities and requirements. JTC will use this information to determine if they are still able to employ the individual.	HR (Risk & Compliance, Group Counsel, COO and Group Board – if appropriate)
Medical Information (Chronic Illness/ Physical limitations/ disability/ special needs)	Vital interest & Legitimate Interest. Consent will additionally be obtained through a sample letter to process this information due to the information being special category data	To understand whether the employee has any ongoing medical issues that JTC need to be aware of which may limit or have an impact on their ability to perform in the role. JTC can use this information to review how they best adapt the environment to suit the employer's needs. Should an employee note something – can then collect additional information in relation to doctors etc. as required.	HR, Health & Safety team, Facilities, First Aider (where appropriate), line manager
Sick leave history (>30 days in last 12 months)	To prepare a contract with 3 rd party healthcare provider	Required for External Healthcare providers to process prior to issuing a contract with the employment. Need to know if employee has had greater than 30 days sick in the last 12 months for cover purposes	HR, 3 rd party healthcare provider
Work Reference	Legitimate Interest	Acts as a verification tool that information provided by the employee in the application process is factual and correct and to ensure any issues in the workplace that JTC should be aware of	HR, line manager (where appropriate), the Referee (provide full name of employee to referee name provided)
Expression of wishes form	To prepare a contract	JTC can process the death in service payments, should an employee die during service.	HR,

Information in addition to that stated above, may be collected throughout the recruitment process. Any information obtained by HR, will be treated as confidential and in line with data protection legislation and best practice.

Where any additional sensitive information is required, above and beyond that detailed above, you will be notified in writing on the condition for processing prior to such information being collected or processed.

4 DATA TRANSFER

JTC is a global business operating in Jurisdictions outside of the countries in the EU and EEA, please be aware that the following information may be processed and stored outside of the EU and EEA. JTC is committed to ensuring that all jurisdictions, in which data is held and processed, abides by data protection legislation that is equivalent to those required in the EU and by EUGDPR.

5 YOUR PRIVACY RIGHTS

The Regulation and Laws:-

APPLICABLE JURISDICTION(S)	LAW(S) (NOT LIMITED TO)
the Netherlands; Luxembourg	General Data Protection Regulation 2016 ("GDPR")
Jersey	Data Protection (Jersey) Law 2018; Data Protection (Authority) Jersey Law 2018
Guernsey	The Data Protection (Bailiwick of Guernsey) Law 2017
Switzerland	the Federal Act on Data Protection, 19 June 1992 ('DPA') and several Ordinances; The Ordinance to the Federal Act on Data Protection ('DPO') and; The Ordinance of Data Protection Certification ('ODPC')
United Kingdom	The Data Protection Bill (HL) 2017-2019 as proposed and applicable to the United Kingdom
Cayman Islands	The Data Protection Law, 2017 (Law), as applicable to the Cayman Islands
Singapore	The Personal Data Protection Act, 2012 as applicable to Singapore
Isle of Man	Data Protection (Application of GDPR) Order 2018; Data Protection (Application of LED) Order 2018; GDPR and LED Implementing Regulations 2018, as applicable to the Isle of Man
South Africa	The Protection of Personal Information Act ("PPI Act") of 2013, as amend and applicable to South Africa
South Dakota	Constitution of the State of South Dakota + Senate Bill 62
Miami	Florida Information Protection Act (2014)
New York	The New York State Personal Privacy Protection Law + the Stop Hacks and Improve Electronic Data Security Act (SHIELD Act)
BVI	In the absence of local legislation, JTC will follow Group best practice in terms of collecting and processing personal data.
Dubai	The DIFC Data Protection Law DIFC Law No.1 of 2007
Mauritius	The Data Protection Act 2017

Depending on where you reside and because of the implementation of one of the above, you have rights as an individual which you can exercise in relation to the information we hold about you.

Individual Data Rights:-

> **Right of access**

You have the right to know what personal data we hold about you and how we use it.

> **Right to rectification**

You have the right to have any errors in the data we hold for you corrected.

> **Right to erasure (to be forgotten)**

You have the right to request the deletion of all personal data relating to you.

> **Right to restriction of processing**

You have the right to restrict how we use your data, eg you can request that we do not process your data for a particular purpose or share it with third parties.

> **Right to data portability**

You have the right to be supplied with all of the personal data that we hold for you.

> **Right to object to processing**

You have the right to object to our use of your data.

> **Right not to be subject to a decision based solely on automated processing**

We do not base any decisions solely on automated processing of your personal data, but if we did, you would have the right to restrict our use of your data for this purpose.

> **Right to lodge a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us**

We can, on request, tell you which data protection authority is relevant to the processing of your personal information.

6 DATA PROCESSING BY THIRD PARTIES

JTC engages the services of various third party services providers with respect to matters listed in the tables detailed in sections 1-3. These third parties are set out in 'HR Data Processing Third Parties'.

7 COMPLAINTS OR QUERIES

JTC strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of JTC's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address provided at the end of this document.

If you want to make a complaint about the way we have processed your personal information, you can contact us at gdpr@jtcgroup.com

Access to Personal Information

JTC tries to be as transparent as possible in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' or equivalent under the relevant legislation or regulation. If we do hold information about you we will:

- > give you a description of it;
- > tell you where it is stored;
- > tell you why we are holding it;
- > tell you who it could be disclosed/transferred to and why; and
- > let you have a copy of the information in a commonly used electronic form.

To make a request to JTC for any personal information we may hold you can either call the GDPR team on +44 (0) 1534 700000, e-mail us on gdpr@jtcgroup.com or write to us at the address provided at the end of this document.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 30 October 2018

How to contact us.

If you want to request information about our privacy policy you can contact us at gdpr@jtcgroup.com or Data Protection Officer, JTC House, 28 Esplanade, St. Helier, Jersey, JE4 2QP