

Data Protection: Privacy notice for candidates applying for roles at Amundi (UK) Limited.

1 WHY DO WE HAVE THIS NOTICE?

Amundi (UK) Limited is a **data controller** and is responsible for processing personal information about you during the recruitment process. We are committed to complying with data protection law and protecting the privacy and security of your personal information. This notice describes how and why we collect and use personal information about you if you have applied for a role and during the recruitment process.

If you have any questions about this policy, please contact our HR team on London_HR@amundi.com.

For the avoidance of doubt this notice, which applies to candidates applying for roles at Amundi (UK) Limited does not form or create any contract between you and Amundi (UK) Limited.

2 WHAT INFORMATION MIGHT WE HOLD ABOUT YOU?

During the recruitment process we may process or hold personal data, or personal information. We may collect, store and use some or all of the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Personal details such as; date of birth, gender and nationality.
- Recruitment information (including copies of right to work documentation, references, qualifications and other information included in a CV or cover letter or as part of the application process).
- Employment history (including job titles, work history, employment references and professional memberships).
- Compensation history.

We may also collect, store and use the following special categories of more sensitive personal information (Special Categories):

- Information about whether or not you have a disability for which we need to make reasonable adjustments as part of the recruitment process.
- Information about criminal convictions and offences as part of the recruitment and background checking process if your application is successful.

3 **HOW IS THIS INFORMATION COLLECTED?**

We collect personal information about you through the application and recruitment process, either directly from you or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, and our third party background checking agencies who may collect personal information from the Disclosure and Barring Service in respect of criminal convictions on our behalf.

4 **HOW DO WE USE THIS INFORMATION?**

4.1 **Our legal bases for using your personal information**

We need the categories of information in the list above for the following purposes;

- to enable us to comply with legal obligations;
- in some cases, we may use your personal information to pursue legitimate interests. For example we hold medical data to make reasonable adjustments; and
- we may also use your personal information in the following situations, which are likely to be rare:
 - where we need to protect your interests (or someone else's interests; or
 - where it is needed in the public interest, for example in the case of diversity monitoring.

4.2 **How we may use your personal information**

The types of situations in which we may process your personal information are listed below:

- Making a decision about your recruitment or appointment.
- Carry out background and reference checks, where applicable.
- Communicating with you about the recruitment process.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Assessing qualifications for a particular job or task
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.

- Ascertaining your fitness to work and comply with legal or regulatory requirements.
- Complying with health and safety obligations.
- To prevent fraud.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We are also permitted to process this information to take steps prior to entering into any potential agreement with you.

5 SPECIAL CATEGORIES OF PERSONAL INFORMATION

5.1 When we can use it

Special Categories (see paragraph 2 above) of personal information require higher levels of protection. We may process such information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our employment or data protection policies.
- Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our employment or data protection policies.
- Where it is needed to make reasonable adjustments, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests and you are not capable of giving your consent (such as a medical emergency), or where you have already made the information public.

5.2 How we may use it

We may use Special Categories of personal information in the following ways:

- We may use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace during the interview process and to make any reasonable adjustments.

6 **CONSENT**

We do not need your consent to process where we have another legal basis to do so as set out above. However, if we do need to seek your consent to processing, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not required for you to give consent and where you have given consent, this can be withdrawn at any time by contacting the HR team.

7 **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We envisage that we will process information about criminal convictions if it is necessary for the job role you are applying for.

We will collect information about your criminal convictions history if we would like to offer you the position (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal records 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 legally required by the FCA to carry out criminal record checks for those carrying out regulated activities; or
- The role requires a high degree of trust and integrity since it involves dealing with clients' financial data and so we would like to ask you to seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data

8 **DATA SHARING**

8.1 **Why might you share my personal information with third parties?**

We may have to share your data with third parties, (including third-party service providers and other entities in the group) where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

If we do share data, we require third parties to take appropriate security measures and only process your data for specified purposes.

8.2 **Which third-party service providers process my personal information?**

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. We use a third-party service provider for background checking.

9 **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also have 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.

10 **DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal requirements.

If unsuccessful, generally we keep the majority of your information for the duration of the recruitment process plus an additional 6 months. If you are successful in your application, information collected will be stored in line with the Employee Privacy Notice. Regardless of whether your application is successful, in accordance with our data retention practices, email correspondence is retained and archived for a period of 7 years.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

11 **AUTOMATED PROCESSING**

We do not generally make any recruitment decisions based solely on automated decision-making. In the event that we do ever use automated decision-making that could have a significant impact on you, we will let you know in advance and give you an opportunity to object.

12 **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

12.1 **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during recruitment process and to contact you about future roles.

12.2 **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information 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 information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information 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 information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

12.3 **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

12.4 **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13 **FURTHER QUESTIONS OR COMPLAINTS**

If you have any questions about this privacy notice or how we handle your personal information, please contact the HR team or DPO. 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.

14 **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time.