

# SANNE GLOBAL CANDIDATE PRIVACY NOTICE

## Introduction - Who Are We?

We are the Sanne Group, a listed multinational provider of alternative asset and administration services.

In this policy, "Sanne", "we", "our" or "us" may refer to any or all of Sanne Group plc and its subsidiaries and affiliates (and their respective successors in title), to include the following:

- **Sanne Fiduciary Services Limited** and its affiliated group (including Sanne Fund Administration Limited and Sanne Trustee Services Limited) are regulated by the Jersey Financial Services Commission (JFSC).
- **Sanne Group (Guernsey) Limited** is regulated by the Guernsey Financial Services Commission.
- **Sanne Group (Luxembourg) S.A.** is regulated by the Commission de Surveillance du Secteur Financier.
- **Sanne Fiduciary Services (UK) Limited** and **Sanne Group Administration Services (UK) Limited**, are authorised and regulated by the Financial Conduct Authority.
- **Sanne Group Administration Services Ireland Limited** is regulated by the Central Bank of Ireland and **Sanne Capital Markets Ireland Limited** and **Sanne Corporate Services (Ireland) Limited** are authorised by the Department of Justice and Equality.
- **Sanne Group (Dubai) Limited** is registered by the Dubai Financial Services Authority as a DNFBP.
- **Sanne Group Asia Limited** is licenced to conduct business in Hong Kong.
- **Sanne Group Shanghai Financial Management & Consulting Co Limited** is licenced by the State Administration of Industry and Commerce.
- **Sanne Mauritius** and its affiliated group are licensed and regulated in Mauritius by the Financial Services Commission.
- **Sanne Fund Services SA (Pty) Ltd** and its subsidiaries and affiliates are regulated by the Financial Services Board and **Sanne Fund Services Malta Ltd** is regulated by the Malta Financial Services Authority.
- **Sanne Group (Netherlands) B.V.** is licensed by the Dutch Central Bank.
- **Sanne Group U.S. LLC** in New York is licensed to conduct business, as is its subsidiary **Sanne Group d.o.o Beograd**.

The contact details for our **Global Data Protection Officer** are set out below.

The identity of the data controller for data protection purposes will vary depending on which jurisdiction your interaction with us occurs (as set out above).

## 1. What is this Notice?

Sanne is a “data controller”. This means we are responsible for deciding how we hold and use personal information about you. This privacy notice is intended to inform candidates who are applying to work at Sanne (whether as an employee, worker or contractor) how and why their personal data will be used, for the purposes of recruitment, and how long it will be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR) or equivalent local data protection legislation.

## 2. What personal data do we collect about you?

Personal data means any information relating to an identified or identifiable natural person. In connection with your application for work with us, we will collect, store and use the following categories of personal information about you:

- Information provided to us in your curriculum vitae and covering letter or in your application form, this includes -
  - > Name, address, email address, telephone number and other contact information;

- > Date and place of birth;
- > Nationality;
- > Immigration, right-to-work and residence status;
- > Job-related information, such as years of experience and work record;
- > Educational and training information;
- > Skills and competencies;
- > Name and contact details of references (please note that if you provide us with contact details of references it is your responsibility to obtain consent from that individual before sending this information to Sanne).
- Any other information provided to us during an interview.
- Sanne does not request sensitive personal data as part of the recruitment process.

### **3. How is your personal data collected?**

- You, the candidate.
- Third party recruitment agencies, to whom you have provided your personal data.
- Your named referees, with your prior consent

### **4. How does Sanne use your personal data?**

We use the personal data we collect about you for the purpose of carrying out our recruitment activities, including:

- Your personal data will be used to assess if you are qualified and suitable for the position you apply to;
- To verify your information;
- To communicate with you about the recruitment process;
- To keep records related to hiring processes;
- To inform you of further career opportunities; and
- To comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

### **5. Data retention**

Sanne will process and store the relevant personal data no longer than is necessary for the recruitment process. In addition to using your data for the position for which you have applied, Sanne may retain and use your personal data to consider you for similar positions only with your explicit consent and for a maximum period of 6 months. If you inform us that you do not want to be considered for other positions, Sanne will delete your personal data within 4 weeks after completion of the hiring process.

### **6. International transfers**

Sanne may disclose or transfer personal data to other offices of the Sanne Group that are located in countries that are outside the European Economic Area in connection with the above purposes. If disclosure or transfer of personal data is being made to a group company of Sanne in a country that does not ensure an adequate level of protection of your personal data, Sanne will make sure additional safeguards will be put in place.

## 7. Security

Sanne is committed to ensuring the security of your personal data. Sanne takes appropriate technical and organisational measures to prevent unauthorised or unlawful processing of your personal data or accidental loss or destruction of your personal data.

The servers that store your personal data have appropriate administrative, technical, and physical controls that are designed to safeguard your data, including industry-standard encryption technology.

Sanne will limit the access to internal systems that hold applicants data to individuals who need access for a legitimate business purpose such as employees in the recruiting, human resource and information technology departments.

## 8. Your rights

You have the following rights:

- **Access correction and deletion of your personal information**

You have the right to access the personal information that Sanne holds about you and may request rectification (correction) or deletion of your personal data.

- **Restriction of processing of your personal information**

You have the right to restrict the personal information that Sanne wants to process about you.

- **Data Portability of your personal information**

You have the right to receive the personal information that Sanne processes about you and/or transmit those data to another controller without hindrance from SANNE.

- **Object to processing of your personal information**

You have the right to object the personal information that Sanne wants to process about you.

- **Complaints**

You have the right to make a complaint with the local supervisory authority with respect to the way Sanne is processing your personal data or the way Sanne is handling your rights.

## 9. Information about criminal convictions

If we would like to offer you a role (conditional on checks and any other conditions, such as references, being satisfactory), we might collect information about your criminal convictions history.

## 10. Data protection officer

Sanne Group plc has appointed a Global Data Protection Officer 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 global data protection officer. You have the right to make a complaint at any time.

## 11. How to contact us:

If you have any questions about our use of your personal data, our retention procedures or our security processes, please contact our Global Data Protection Officer at: [dpo@sannegroup.com](mailto:dpo@sannegroup.com) or at our global headquarters Sanne Group plc, 13 Castle Street, JE4 5UT, Jersey.

## **12. Changes to this Policy**

This Privacy Notice is dated 12 June 2018.

We reserve the right to amend this Privacy Notice at any time without notice, in which case the date of the policy will be revised.

*Information on Sanne and its regulators can be accessed via [sannegroup.com](http://sannegroup.com)*