

Recruitment Privacy Statement

**Service defines us,
empowers you**

Introduction - Who Are We?

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

In this Privacy Statement, "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), which include the regulated entities listed on our website.

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 Statement 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.

We may also collect and process "special category" data in certain circumstances where we are required to for the purposes of our legal and/or regulatory obligations including, but not limited to, legislation and regulatory obligations relating to Anti-Money Laundering and Combatting the Financing of Terrorism and all other related legislation. This may include information regarding your racial or ethnic origins, political opinion and affiliations or information relating to criminal records.

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.

Sanne does not process sensitive personal data. However, if Sanne under certain circumstances does process sensitive personal data we will ask the applicants explicit prior consent. To the extent you make sensitive personal data available to Sanne, you consent to Sanne processing such personal data in accordance with this Privacy Statement.

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 within Sanne to other offices 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 are 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 applicant's 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

8.1. You have the following rights, under certain circumstances, in respect of personal data:

- Right to access and port personal data;
- Right to rectify personal data;
- Right to restrict the use of personal data;
- Right to request that personal data is erased;
- Right to object to processing of personal data; and
- Right in relation to automated decision making and profiling.

We will respond to your request in a reasonable timeframe in accordance with applicable law.

8.2. Where we have processed personal data based on our legitimate interests, you have a specific right of objection. If you choose to do so, we may not be able to provide services to you.

8.3. You also have the right to lodge a complaint with the Office of the Data Protection Commissioner in Jersey (<https://oicjersey.org/>) or a Supervisory Authority of your usual residence or place of work or of the place of any alleged breach of data protection legislation.

Additional Information: If you choose to exercise any of your rights under the GDPR or other applicable Data Protection Legislation, you have the right to not receive discriminatory treatment by us.

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 Statement. If you have any questions about this Privacy Statement or how we handle your personal data, please contact the Global Data Protection & Privacy Team. 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 data protection officer at: dpo@sannegroup.com or at our global headquarters: Sanne, IFC 5, St. Helier, Jersey, JE1 1ST.

12. Changes to this Privacy Statement

This Privacy Statement is dated 14 September 2020.

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

About Sanne

Sanne is a leading global provider of alternative asset and corporate services.

Established for over 30 years and listed as a FTSE 250 company on the Main Market of the London Stock Exchange, Sanne employs c1,800 professionals worldwide and administers structures and funds that have in excess of £250bn assets.

We deliver tailored fiduciary services to a highly valued international client base through a global network of offices located in 20 leading financial jurisdictions, which are spread across the Americas, Europe, Africa and Asia-Pacific.

Clients are serviced through regional businesses which are led by global leaders with deep experience in alternative asset and corporate services. Each business contains multifunctional and skilled teams of professionally qualified people who are aligned to the specific requirements of each client, across one accredited platform.

Our specialist expertise is delivered across private debt, capital markets, real assets, private equity, hedge and corporate services. Our clients include leading fund managers, financial institutions and global corporates.

Sanne at a glance



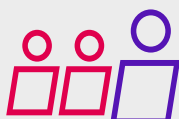
More than 1,800 people worldwide



A FTSE 250 listed business



Over £250 billion assets under administration



Leaders in fund and administration services



Accredited business process



20 jurisdictions AMERICAS / EMEA / ASIA-PACIFIC

Our promise

We believe that clients should expect more, so we stand for professionalism, innovation and quality. If you require a strategic relationship and a true business partnership with people who genuinely care about your growth. We are Sanne.

Let's talk...

For more information, please visit our website sannegroup.com