

Job applicant privacy notice

Data controller: SECOR Investment Advisors (UK) LLP (the “Company”)

Data protection Contact: Verity Wakeford - vwakeford@secor-am.com

As part of any recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the Company collect?

The Company collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements if provided;
- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- Details of any FCA controlled function status.

The Company may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests such as psychometric testing.

The Company may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records check or screenings. The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does the Company process personal data?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations and those required by the FCA or SEC. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

The Company may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. The Company processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, the Company may keep your personal data on file in case there are future employment opportunities for which you may be suited. The Company will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise which may include managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles,

The Company will also share your data with our third party outsourced HR provider if they are involved in the recruitment process. However, the Company will not share your data with other third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Your data may be transferred outside the European Economic Area (EEA) to other SECOR Group entities in the US if deemed necessary to the recruitment process.

How does the Company protect data?

The Company takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. The Company employs a number of security products to protect the firm's critical infrastructure and sensitive data. The Company also performs an independent third-party IT risk assessment annually and also uses secure cloud services for data security and transmission.

For how long does the Company keep data?

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, accounting, or reporting requirements. 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.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. If your application is unsuccessful, we will retain and securely destroy your personal information in accordance with our record retention policy and applicable law.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and

- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact **Verity Wakeford** - vwakeford@secor-am.com

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all.

Automated decision-making

Recruitment processes are not based solely on automated decision-making.