

JOB APPLICANT PRIVACY NOTICE

Introduction

As part of any recruitment process, Carmignac Group (**Carmignac, we, us, our**) collects and processes personal data relating to job applicants. This Privacy Notice sets out the categories of your personal data we collect, how we collect it, what we use it for and with whom we share it, in accordance with the General Data Protection Regulation (**GDPR**).

By **personal data** we mean any information relating to you such as your name or contact details. Personal data does not include data which has been anonymised, such as data from equal opportunities monitoring carried out on an anonymised basis.

Carmignac is a **data controller**. This means that we are responsible for deciding how we hold and use personal data about you. Should you have any questions about this Privacy Notice you can contact us at dpo@carmignac.com.

What information do we collect about you and what do we use it for?

The types of personal data about you which we may collect, store and use are set out in the table below and in each case we have specified the purpose and our 'lawful basis' for processing it. The law specifies certain 'lawful bases' for which we are allowed to use your personal data. Most commonly, we will rely on one or more of the following lawful bases for processing your personal data:

- where it is necessary for **compliance with a legal obligation** to which we are subject; and/or
- where it is necessary for the purposes of the **legitimate interests** pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms, which require protection of your personal data.

Where Carmignac relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of job applicants and has concluded that they are not.

Category of personal data	Examples	Purpose	Lawful basis for processing	Legitimate interest (where applicable)
Contact details	Name, address, email address and telephone number	For administration purposes during the recruitment process	Legitimate interests To take steps prior to entering and to enter a contract with job applicants	To make contact with job applicants during recruitment process
Application related documents provided by candidates	Application form, CV and covering letter	To assess job applicants and shortlist for interview	Legitimate interests	To make recruitment decisions and maintain standards of integrity and excellence in the Company's workforce
Application documents generated by the Company	Feedback and notes from interviews or other selection processes	To assess the job applicant's application and make recruitment decisions	Legitimate interests	To make and justify recruitment decisions and maintain standards of integrity and excellence in our workforce

Details about current remuneration	Current level of salary and benefit entitlements	To make decisions about the financial package on offer	Legitimate interests	To ensure appropriate and attractive financial packages are offered to job applicants.
------------------------------------	--	--	----------------------	--

Special categories of personal data

Some personal data is more sensitive and requires a higher level of protection.

We will process special category personal data because we have a lawful basis for doing so and primarily because it is necessary:

- for the purposes of carrying out our obligations and exercising specific rights in the field of employment law (**employment law obligations**); and/or
- for the assessment of your **working capacity**.

However, in limited circumstances we may be required to process special category data from job applicants to respond to and defend **legal claims**.

The special categories of data about you which we may collect, store and use are set out in the table below and in each case we have specified the purpose and our 'lawful basis' for processing it.

Category of special categories of personal data	Examples	Purpose	Lawful basis for processing
Medical/health information provided as part of application process	Details relating to any disability	To make reasonable adjustments to the recruitment process	Compliance with legal obligations and employment law obligations
Immigration information	Passport, driving licence, visa, work permit	To check your right to work in the country for which you have applied.	Compliance with legal obligations and employment law obligations

We do not require you to provide any special categories of personal data other than those outlined in the table above. We recommend that you do not include any additional special categories of personal data in your application as it is unlikely to be relevant to the application process.

Information relating to criminal convictions and offences

For some roles (i.e. FCA registered employees), Carmignac is obliged to seek information about criminal convictions and offences in order to determine your fitness and propriety. Where Carmignac 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 law.

What if you do not provide the personal data we request?

You are not under any statutory or contractual obligation to provide data Carmignac requests during the recruitment process. However, if you do not provide the information, we may not be able to take your application further. We will notify you if this is the case.

Change of purpose

We will only use your personal data for the purposes for which we collected it (as identified under Purpose above), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

How do we collect this information?

In addition to the data we collect from you during the recruitment process, we may receive personal information about you from third parties, such as:

- recruitment consultants;
- background check firms;
- previous employers; and
- referees

With whom will we share your information?

Your information will be shared internally including with other entities in our group for the purposes of the recruitment process. This includes members of the HR, Compliance and recruitment teams, interviewers and managers in the business area to which the vacancy relates.

Carmignac will not share your data with external third parties, unless your application for employment is successful and it makes you an offer of employment. Carmignac 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 (when applicable) to obtain necessary criminal records checks. We may share your personal data with third parties, for example with a regulator or otherwise to comply with the law.

Aside from the recruitment process concerning US candidates, we will not transfer your data outside the European Economic Area.

How does Carmignac protect data?

Carmignac takes the security of your data seriously. It has internal policies and controls in place and its staff are expected to comply with those to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our staff in the proper performance of their duties.

For how long does Carmignac keep data?

If your application for employment is unsuccessful, Carmignac will hold your data on file for six months after the end of the relevant recruitment process. If you agree to allow Carmignac to keep your personal data on file, we will hold your data on file for a further two years for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data will be deleted or securely destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained throughout the period of employment of the person concerned and archived as required by law.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

Information about criminal convictions and offences that can be collected will be reviewed by Human Resources and Compliance departments and will not be retained for more than 6 years.

Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- request **access** to your personal data (commonly known as a **data subject access request**) and request certain information in relation to its processing;
- request **rectification** of your personal data;
- request the **erasure** of your personal data;
- request the **restriction** of processing of your personal data;
- **object** to the processing of your personal data; and
- request the **transfer** of your personal data to another party.

If you want to exercise one of these rights please contact us at dpo@carmignac.com. You also have the right to lodge a complaint with the relevant supervisory authority for data protection issues.

Fees

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

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 to ensure that personal data is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact dpo@carmignac.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented.

Further information

If you require any further information, please do not hesitate to contact dpo@carmignac.com