

RECRUITMENT: CANDIDATE DATA PRIVACY NOTICE

Schroders Personal Wealth is made up of a number of different legal entities. You are applying for a role with Scottish Widows Schroder Personal Wealth Limited ("SPW"). This company is known as the 'Data Controller' for information collected about you during the recruitment and on boarding process.

You can find out more about SPW at www.spw.com

If you have any questions, or want more details about how we use your personal information, you can email DataPrivacy@spw.com.

How we use your personal information

This privacy notice is to let you know how SPW promise to look after your personal information. This includes what you tell us about yourself and what we learn through the recruitment process. This notice also tells you about your privacy rights and how the law protects you.

How we use your information

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside SPW. The law says we must have one or more of these reasons:

- To fulfil your contract of employment or another contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. Even then, it must not unfairly go against your rights. Examples of legitimate Interests are detailed in the table below.

The law and other regulations treat some types of sensitive personal information as special. This includes information about racial or ethnic origin, sexual orientation, religious beliefs, trade union membership, health data, and criminal records. We will not collect or use these types of data without your consent unless the law allows us to do so. If we do, it will only be when it is necessary:

- For reasons of substantial public interest, or
- For employment purposes, or
- For the detection and prevention of fraud and crime, or
- To establish, exercise or defend legal claims.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are, when that is one of the reasons

Our reason	What we do	
To enter into and fulfil a contract of employment	Manage recruitment processes Manage shortlisting Obtain references and vetting	
To fulfil another contract we have with you if your application is successful	Provide pension schemes and life assurance arrangements Manage shareholding requirements Manage colleague benefits Apply colleague discounts	
Our Legal duty	Ensure rights to work Comply with legal obligations and regulation Provide information to regulators, courts or government bodies	
Our legitimate interests	What we do	Explanation of interest:
	Retain copies of the application Ensuring security of premises, data and technology Address complaints and queries Market research purposes	To comply with rules and regulations that apply to us To protect our staff, customers and property from inappropriate access, damage, crime or fraud To manage our staff as efficiently as possible

	Manage training and development	<p>To communicate with you and comply with your instructions</p> <p>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit.</p>
Consent	When we rely on consent to process your information we will tell you when we obtain your consent.	
For processing special categories of personal data		
Substantial public interest	Monitor diversity by using racial, ethnic origin, religion, health and sexual orientation data	
For employment purposes	To make adjustments to accommodate health requirements	
For the prevention and detection of fraud and crime	Use criminal records data to help detect, prevent and prosecute unlawful acts and fraudulent behaviour	
Legal claims	Use any special categories of data as needed to establish, exercise or defend legal claims.	
Consent	When we rely on consent to process your information we will tell you when we obtain your consent.	

Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Type of personal information	Description
Financial	Details about your salary, bonus, pension and other benefits.
Contact	Where you live and how to contact you.
Professional	This includes details about your work or profession, education, skills, languages and qualifications.
Transactional	Details about bank accounts, salary, pension and tax payments.
Contractual	Details about performance of your employment contract.
Communications	What we learn about you from letters, emails, and conversations between us.
Social Relationships	Contact details of emergency contacts, next of kin and the beneficiaries of any occupational pension or insurance schemes.
Open Data and Public Records	Details about you that are in public records such as registers of bankruptcies, births, or public offices held, or information that is in the public domain, including on social networks.
Documentary Data	Details stored in documents in different formats, or copies of them. For example, your passport, drivers licence, or birth certificate.
Special categories of personal data	Information about:

	<p>Racial or ethnic origin</p> <p>Religious, philosophical and political beliefs</p> <p>Sexual orientation or sex life</p> <p>Health data</p> <p>Criminal records of convictions and offences.</p>
Consents	Any permissions, consents, or preferences that you give us.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance or a Social Security number.

Where we get data from

Data you give to us:

- When you apply for a role, or complete on boarding literature
- When you talk to us during the recruitment process
- When you use our systems, tools and websites

Who we receive and share your personal information with

We may receive and share your personal information with other companies within SPW and these organisations:

- Our suppliers, agents and advisers – such as IT provider – that provide services that help us to manage your recruitment, employment and benefits
- Recruitment agencies
- Partnering Universities
- Social networks
- HMRC and other tax authorities

- Disclosure & Barring Service or Disclosure Scotland, or Access NI for individuals located in Northern Ireland and relevant International governing body for individuals that have resided outside of the UK within the last 18 months.
- Home Office and other government bodies
- Credit reference agencies
- Fraud prevention agencies, including CIFAS
- Your previous employers or referees
- Courts
- Law enforcement agencies
- Vetting agencies
- Pension and life assurance providers/trustees.

Criminal Records Checks

The Disclosure and Barring Service, Disclosure Scotland or Access NI and other relevant International governing body will refer the details provided on your application form to government and law enforcement bodies in accordance with any relevant legislation. The details provided to these bodies will be used for identifying possible matches to records held by them. Where such a match is established, data may be released to the Disclosure and Barring Service, Disclosure Scotland or Access NI and other relevant International governing body for inclusion on any certificate issued. The details provided on this form may be used to update the records held by the bodies specified above. The details provided on this application form may be used to verify your identity for authentication purposes.

SPW is required by the Disclosure and Barring Service, Disclosure Scotland or Access NI and other relevant International governing body Codes of Practice to treat all applicants who have a criminal record fairly and not discriminate because of a conviction or other information revealed. It also obliges us to have a written policy on the recruitment of ex-offenders; a copy of which can be given to Disclosure applicants at the outset of the recruitment process.

Credit Reference Agencies (CRAs)

We may ask you to provide physical forms of identity verification when you apply for a position. Alternatively, we may search credit reference agency files in assessing your application, including searches on any past or other names used by you and searches on addresses where you have lived for the past five years. The agency also gives us other details and information from the Electoral Register to verify your identity. The agency keeps a record of our search, whether or not your application proceeds. Our search is not seen or used by lenders to assess your ability to obtain credit, although it may be used for debt tracing and to prevent money laundering.

You have a right to apply to the credit reference agencies for a copy of your file.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice.

This includes details about:

- Who they are.
- Their role as fraud prevention agencies.
- The data they hold and how they use it.
- How they share personal information.
- How long they can keep data.
- Your data protection rights.

SPW carries out their credit searches using Equifax. Their address is:

- Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS www.equifax.co.uk

Fraud Prevention Databases

The personal information we have collected from you will be shared with Cifas. Cifas is a fraud prevention agency of which SPW is a member.

The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. Further details of how your information will be used by us and Cifas, and your data protection rights, can be found by contacting DataPrivacy@spw.com

How we use your information to make automated decisions

When you apply for a position we may use automated processes to assess your suitability for the role. These automated measures are tested regularly to make sure they are fair and unbiased.

As a person you have rights over automated decisions made in relation to you. In particular:

- You can ask that we do not make our decision based on the automated score alone.
- You can object to an automated decision and ask that a person reviews it.

If you want to know more about these rights, please contact DataPrivacy@spw.com

Sending data outside of the EEA

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions
- Comply with a legal duty
- Work with our suppliers, agents and advisers who we use to help manage your recruitment, employment and benefits
- Sharing the data within SPW

If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the [European Commission Justice](#) website.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the [European Commission Justice](#) website.

How long we keep your personal information

We will keep your personal information for the duration of the recruitment process, and we may keep your data for up to 3 years for one of these reasons:

- To respond to any questions or complaints
- To show that we treated you fairly
- To maintain records according to rules that applies to us.

We may keep your data for longer than 3 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

If you are successful, you will receive Colleague Data Privacy Notice describing how we will process your data, including retention periods.

How to get a copy of your personal information, update your information or object to us using it

You have the right of access to your personal data. You also have the right to transfer some information to other organisations.

For more details on how to request a copy of your information please raise a query on the [HR Queries Form](#).

We take measures to ensure that the information we process is accurate and proportionate, if you want to update the information we hold or want to object to our use of your personal information please email to DataPrivacy@spw.com.

How to withdraw your consent

You can withdraw your consent at any time. Please contact DataPrivacy@spw.com if you want to do so.

How to contact us for more information

Please let us know if you want more information about the way we use your personal information.

You can contact the SPW Data Protection Officer at DataPrivacy@spw.com.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern at [ICO Make-a-Complaint](#)

We keep our privacy notice under regular review, and we will reflect any updates within this notice. This privacy notice was last updated on 26/10/2020.