

APPLICANT DATA PRIVACY NOTICE

This Data Privacy Notice applies to personal data relating to your application for employment with Apex Fund Services Holdings Ltd. and subsidiaries and affiliates (hereinafter "**Apex**") as data controllers, as described below. It explains what data we collect about you, how we'll use that data, who we'll share it with, and the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure. This Privacy Notice covers all aspects of your interaction with Apex in your capacity as an applicant, including recruitment and pre-employment screening and we may update this notice at any time. Wherever we've said 'you' or 'your', this means you or any authorised person who engages with us on your behalf (e.g. recruitment agencies you have authorised to liaise with us on your behalf). When we say 'we', we mean Apex acting as a data controller in respect of your personal data in your applicant capacity. Unless otherwise stated below, the data controller for the purposes of this notice will be the Apex entity that you have applied for employment with. The data we collect may include:

DATA THAT APEX RECEIVES DIRECTLY FROM YOU

- personal details, e.g. name, previous names, gender, date and place of birth, employment history;
- contact details, e.g. address, email address, landline and mobile numbers;
- data concerning your identity e.g. photo ID, passport data, National Insurance number, National ID card, birth number (or equivalent), tax identification number and nationality;
- data on family members and or dependents;
- health data including medical condition, health and sickness records or confirmation if you are able to perform a given position (as applicable), data about any disabilities you might have; market research, and data and opinions expressed when participating in applicant surveys;
- other data about you that you give us by filling in forms or by communicating with us (e.g. interviews or assessments), whether face-to-face, by phone, email, online, or otherwise;
- recruitment data (including copies of right to work documentation, references and other data included in a CV or cover letter or as part of the application process);
- data concerning any qualifications you hold e.g., university education, professional certifications;
- employment records (including job titles, work history, working hours, training records).

DATA APEX IS COLLECTING ON YOU FROM VARIOUS SOURCES

- data we use to identify and authenticate you, e.g. your signature, or additional data that we receive from external sources that we need for compliance purposes;
- tax compliance or other related data to the extent required by law;
- geographic data, e.g. about which Apex offices you visit;
- cookies and similar technologies we use to recognise you - please consult our webpage;
- investigations data, e.g. due diligence checks, fraud, sanctions and anti-money laundering checks;
- complaints data;
- application data including data about your individual performance;
- data that we need to support our regulatory obligations, e.g. data about transaction details, politically exposed person and sanction checks);
- data you have asked us to collect for you or we collect as part of our vetting process, e.g. work references from previous employers;
- how Apex will use your data;
- we will only use your data where we have another lawful reason for using it. These reasons include where we:
 - need to pursue our legitimate interests;
 - need to process the information to comply with a legal obligation;
 - believe the use of your information as described is in the public interest (e.g. for the purpose of preventing or detecting crime or for equal opportunity monitoring and or reporting purposes).

WHY APEX WILL USE YOUR DATA

- to administer your applicant relationship with us e.g. schedule interviews, etc.;
- to manage our relationship with you;
- to prevent or detect crime including fraud and financial crime, e.g. financing for terrorism;
- for security, staff vetting, and business continuity;
- for risk management;
- to conduct applicant surveys and data analytics, (workforce assistance and succession planning);
- to protect our legal rights and comply with our legal obligations;
- for service, system or product development and planning, insurance, audit etc.;

- for the vetting checks that we may perform like: working permit controls, verification of identity, tax compliance, conduct checks, conflict of interest checks, personal account dealing checks, etc.

APEX AND DATA SHARING

- we may share your data with others where lawful to do so including where we or they:
- have public or legal duty to do so, e.g. preventing fraud, tax evasion and financial crime;
- are in connection with regulatory reporting, litigation or asserting or defending legal rights; law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;
- have legitimate business reason for doing so, e.g. to manage risk, verify your identity or assess your suitability for roles; and have asked you for your permission to share it, and you've agreed;
- are tax authorities, trade associations, credit reference agencies;
- relate to other parties involved in the dispute, grievances and investigations.

APEX AND DOCUMENT RETENTION

- we keep your data in line with our data retention policy. Apex will keep your core application data for a period of ten years from the end of our employment relationship with you or as per the group or applicable local data retention schedule. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes (e.g. dispute resolution).
- If your application for a job with Apex is unsuccessful, we will retain any personal data collected such as CV, cover letter, where necessary and based on legal requirements. All other documentation will be deleted at the end of recruitment process.

APEX TRANSFERRING YOUR DATA OVERSEAS

Your data may be transferred to and stored in locations outside the European Economic Area (EEA), including countries that may not have the same level of protection for personal data. When we do this, we will ensure it has an appropriate level of protection and that the transfer is lawful.

We may need to transfer your data in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and / or for our legitimate interests. In some countries the law might compel us to share certain data, e.g. with tax authorities. Even in these cases, we will only share your data with people who have the right to see it.

YOUR RIGHTS

You have a number of rights in relation to the data that we hold about you. These rights include:

- the right to access to the data we hold about you and to obtain data about how we process it;
- the right to request that we rectify your data if it's inaccurate or incomplete;
- the right to request that we erase your data. We may continue to retain your data if we're entitled or required to retain it;
- the right to object to, and to request that we restrict, our processing of your data in some circumstances.

There may be situations where you object to, or ask us to restrict, our processing of your data but we're entitled to continue processing your data and / or to refuse that request if there is a legitimate reason for doing so.

APEX AND DATA SECURITY

Apex uses a range of measures to keep your data safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any data and applying appropriate measures

If you would like further information on any of the information above, please address questions, comments and requests to [the relevant local Data Protection Officer](#).