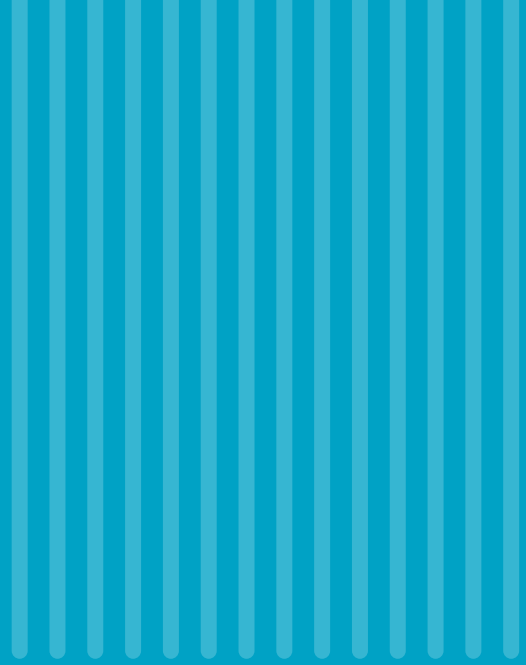


Recruitment Data Privacy Notice



Recruitment Data Privacy Notice

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1. What is a Data Privacy Notice and why is it important?

We know that your personal data is important to you and it is important to us too. This Data Privacy Notice tells you what we use your personal data for and explains your rights around how we use it.

This Data Privacy Notice applies to people applying for a role with Cornmarket Group Financial Services Ltd., Christchurch Square, Dublin 8.

Please read this Data Privacy Notice to understand how and why we use your personal data. This Data Privacy Notice will be reviewed from time to time to take into account changes in the law or changes in how we process your personal data. Where there is a need to process personal data for a purpose other than those set out in this Data Privacy Notice, we will notify you of this and a current version of our Data Privacy Notice will always be available in a prominent position on our recruitment channels.

2. Who are we/the data controllers?

When you apply for a role at Cornmarket, you are choosing to allow Cornmarket Group Financial Services Ltd. to have access to your personal data. Cornmarket Group Financial Services Ltd. is the data controller.

If you have any queries in relation to our use of your personal data, you should contact our Data Protection Officer as outlined in Section 8 of this Data Privacy Notice.

3. What personal information we collect and why?

For prospective employees, we use personal data to undertake any activity relating to our recruitment and selection process and to administer employment contracts where candidates have been successful. This includes using your personal data to enable us to contact you, conduct interviews, assess your suitability as a potential candidate and if successful, preparing your employment contract and internal processing procedures to 'on-board' you. The processing is necessary to enter into a contract (where successful) and for our legitimate interests in managing an effective recruitment process. We may also need to process your personal data to ensure that we are complying with legal obligations, for example, it is mandatory to check a successful applicant's eligibility to work in Ireland before employment starts.

Personal data required during this process includes, but is not limited to: Name, address, contact phone number, work history, education history, salary and benefits package, CCTV if you enter our premises for an interview, photograph for authentication, referee names, qualification certificates, interview notes and related documentation.

Most of the personal data that we process about you is provided by you. In addition, we may collect personal data from:

- previous employers via references (with your permission)
- due diligence and financial background check through a third party provider (with your permission)
- education institutions (e.g. proof of qualifications)
- third party recruitment agencies, staffing companies/websites which introduce you to us
- public searches including professional networking websites and background checks where permitted by law
- CCTV footage if you enter our premises for an interview

Where there is a need to process your data for a purpose other than those set out in this Data Privacy Notice or otherwise outlined to you, we will inform you of this.

Third Party Personal Data

If you give us personal data about someone else (for example, if you are acting as a recruiter/agent on behalf of a job applicant or if you provide contact details for reference purposes), you are responsible to make sure that you have that person's permission to share their personal data and to make them aware of this Data Privacy Notice.

4. Lawful Basis for Processing Your Personal Data Explained

We must have a lawful basis to collect and use personal data and we explain this below:

4.1 With your consent

We will process your personal data for the purposes set out above with your prior consent, to the extent such consent is mandatory under applicable law.

Special Categories: We need your consent to collect and use personal data referred to as special categories of personal data or sensitive personal data or for certain uses of your personal data. You may provide sensitive personal data to us by responding to questions when applying for a role (i.e. in your CV or otherwise). If you provide sensitive personal data to us, you do so voluntarily.

Cookies: We also use cookies to follow the application process, to improve the use of our internet site.

Your right to withdraw or revoke consent: Where we process your personal data based solely on consent, you have the right to withdraw or revoke that consent at any time. In some cases, you may decline to provide us with your personal data. However, if we believe that we require relevant information to effectively and properly manage your application through the recruitment process, we may not be able to continue with your job application.

4.2 Needed for the purposes of entering into an employment contract

We will process your personal data for the purposes of entering into an employment relationship which will cover the assessment of your personal data as part of the application process and when the recruitment process results in an offer of employment, your onboarding as an employee and the initiation of our employment relationship.

4.3 Legitimate interests

The processing of your personal data is also necessary for our legitimate interests, including:

- Management of the recruitment/application process: we process personal data to ensure that we have an effective recruitment process and to enter into an employment contract with successful candidates, including:
 - Receiving and reviewing CV's and application information from candidates
 - Assessing suitability for employment for the role which applications are submitted as well as future roles that may become available
 - Managing applications
 - Communicating with candidates regarding applications
 - Tracking of interview assessments
 - Performing administrative functions
 - Job offers
 - Job declines/regrets
 - Capturing of referee details
 - Preparation and issue of contracts to successful candidates
- Quality checks and audit: We use job application data of all candidates (successful and unsuccessful) to quality check the recruitment process and to review the recruitment process in the event of complaints
- Statistical analysis and metrics: we combine candidate personal data to perform data analytics including analysis of our talent pool in order to better understand the candidate base and how to attract talent

Where we rely on our legitimate interests for processing as described above, this doesn't affect your privacy rights. We have taken account of any privacy risks and ensured that your data protection rights are not affected. We believe that this processing is of benefit to you. Please contact us if you have any queries.

4.4 Required by Law

The processing of your personal data is necessary to ensure that we are complying with our legal obligations. For example:

- it is mandatory to check a successful applicant's eligibility to work in Ireland,
- certain roles carry additional requirements under law and regulation and these require more comprehensive due diligence regarding successful candidates. We may request information about your financial and/or criminal records from third parties, where required for this purpose.

5. Who do we share your personal information with?

We disclose personal data with third providers only in connection with the purposes for which it was collected including, with:

5.1 Service Providers

- Information System (IS) Providers: your personal data is stored on our HR IS provider systems (including cloud based applications). We ensure that the providers selected have the appropriate technical and organisational measures and safeguards in place to protect your personal data
- Online Assessment Providers: if an online assessment is part of the selection process. The data shared will be mainly your name and email address and the assessment provider will share your results with us.
- Occupational Health Specialists (OHS): we will share necessary personal data with OHS where required
- Auditors: when your recruitment file has been randomly selected as part of an audit
- Independent contractors and external consultants: occasionally we engage with independent contractors and external consultants, for example, to complete a specialist recruitment and selection process.

5.2 Other Third Parties

- Resourcing partners: your personal data will be shared with a recruitment agency/third party resourcing partner where you are being represented by an agency/third party resourcing partner.

5.3 Regulators

- We share personal data with relevant regulatory authorities where necessary, for example, to meet Fitness and Probity requirements.

5.4 Law Enforcement

- Your personal data will be shared with other companies, organisations and associations in order to prevent, detect or investigate crime and we will also share any information that is required by law.

6. How long do we keep your personal data?

We retain your personal data as long as we have an ongoing relationship with you.

Your personal data will automatically be deleted from our recruitment system 12 months after your application.

If you are offered and accept an offer of employment, certain personal data collected during the pre-employment period may become part of your employee file to be retained throughout your employment for a period after your employment.

If your application is unsuccessful, we may continue to retain personal data relevant to your job applications. Your personal data will only be retained for as long as required by local employment legislation and our internal policy and practices, and in compliance with applicable law. Please contact us if you have any questions on our retention policy and practices.

7. What are your rights?

You have a number of rights over your personal data which you can exercise free of charge by contacting us using the details in Section 8 of this Data Privacy Notice. You need to give us information to identify you and we will respond to you within one month. Any restrictions to your rights will be explained in our response.

7.1 Right to Information

You have the right to information set out in this Data Privacy Notice. The most recent version of our Data Privacy Notice will always be accessible on the recruitment section of our website and other recruitment channels where you can apply for a role with Cornmarket. If we change the type of personal data we collect and/or how we use it, we will inform you of the changes.

We have controls in place to protect your personal data and minimise the risk of security breaches. However should any breach result in a high risk for you, we will inform you without undue delay.

7.2 Right to Restrict or Object

You can restrict or object to any unfair and unlawful collection or use of your personal data. As explained above you have the right to withdraw consent and object to certain processing, for example, direct marketing. You have the right not to be subject to automated decision-making including profiling.

7.3 Right to Correct and Update

You can ask us to correct and update personal data we hold about you. It is important that we have your up to date personal data to ensure a fair and efficient recruitment process.

7.4 Right to Delete and Be Forgotten

You can have your personal data deleted if it is incorrect, if it is no longer needed or has been processed unfairly or unlawfully. We will keep a record of your request so we know why your personal data was deleted.

Where we process your personal data based solely on consent, you have the right to withdraw that consent at any time. Please note that we retain certain personal data as explained in section 6 above notwithstanding that you may revoke your consent in order to delete your candidate profile.

7.5 Right to Portability

You can ask for a copy of all personal data that you gave us (including through your interactions with us), and which we hold in an automated format. You can receive this in a machine readable format that allows you to keep it.

You may also request us to send your personal data in a machine readable format to another company. The format depends on our ability to provide this in a secure way that protects your personal data.

7.6 Right to Access

You have the right to know what personal data we hold about you and to receive a copy of your personal data. We must tell you:

- Why we hold it
- Who we pass it to, including whether we transfer it outside the EU
- How long we keep it for
- Where we got it from
- If we carried out any automated-decisions, and if so, the logic behind it and what it means for you

This right does not allow you to access personal data about anyone else.

To access your personal data please write to us or email us using the contact details in Section 8 of this Data Privacy Notice. To help us respond as quickly as possible, please let us know if you are only looking for copies of specific personal data.

In certain circumstances, we may need to restrict the rights listed above in order to safeguard the public interest (e.g. the prevention and detection of crime) and our interests (e.g. compliance with our legal responsibilities).

8. Data Protection Officer (DPO)

If you have any queries in relation to this Data Privacy Notice, or if you have any concerns as to how your personal data is processed, please contact us using the details below:

Data Protection Officer,
Cornmarket Group Financial Services Ltd,
Christchurch Square,
Dublin 8.

Tel: 01 4084000

Email: dataprotection@cornmarket.ie

9. Complaints

If you are not happy with how we have processed your personal data or handled your data protection rights, you have a right to make a complaint with the Data Protection Commission by contacting them using the details below:

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

Telephone: +353 578 684 800
+353 761 104 800

Website: <http://www.dataprotection.ie>

Email: info@dataprotection.ie

This Privacy Notice is effective from December 2019