



IFM Limited Recruitment Privacy Notice

IFM Limited ("IFM") is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during the recruitment process, in accordance with the Gibraltar General Data Protection Regulation ("Gibraltar GDPR") and Data Protection Act 2004 ("DPA") and applies to all candidates.

This privacy notice is for information only, it is not a contractual agreement. We reserve the right to update this privacy notice at any time.

Information we may collect about you

In connection with your application to work with us, we will collect, store and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and any covering letter/emails;
- Any information you provide to us during an interview;
- The information you provide when completing our Recruitment Questionnaire;
- Information you provide in relation to your right to work documentation; and
- Information about your criminal record, either provided by you in the Recruitment Questionnaire, or through screening checks (described below).

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical conditions, health and sickness records

We collect this personal information from the following sources:

- You, the candidate;
- Recruitment agencies;
- Search consultants;
- Screening checks;
- Referees; and
- Data from third party publicly accessible sources.

In addition we may capture your image on CCTV in pursuance of our legitimate interests to keep our premises secure. Your image will only be stored for a period of 60 days¹ and CCTV footage will be deleted after such period has expired unless requested by an authority or other law enforcement entity or body for the purposes of prevention and detection of crime or otherwise as may be required under any applicable laws or following an incident or alleged incident.

Purpose of processing

We have a legitimate interest² in processing your personal data during the recruitment process and for keeping records of the process. Processing data from you allows us to manage the recruitment process, assess and confirm your suitability for employment and decide to whom to offer a role. In some cases, we need to process data to ensure that we are complying with our legal obligations. For example we are required to check your eligibility to work in Gibraltar. We also need to process your data to enter into a contract with you. We are entitled to carry out a screening check on you

¹ This is a rolling 60-day period, meaning footage older than 60 days is deleted every day.

² GDPR Article 6 1(f)



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in order to satisfy ourselves that you are not subject to sanctions, or identify any presence of you on legal or regulatory watchlists and adverse media which makes you unsuitable for the role. We have a legitimate interest to carry out this screening to prevent fraud, money laundering, financial crime, bribery and corruption, and ensure our fitness and propriety obligations are fulfilled.

We process health information if we need to make reasonable adjustments to the recruitment process for you³.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

Data Access and Protection

Your information will be shared internally and with Group Companies (including ISOLAS LLP and Fiduciary Management Limited) for the purposes of the recruitment exercise. This includes members of HR and recruitment team, interviewers, managers and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application is successful and we make you an offer of employment. We will then share your data with former employers/referees to obtain references for you, your data will also be input to our third-party screening check service to check for sanctions, legal & regulatory issues, and adverse media. If your employment involves a Regulated Function or provision of legal services we will share your data with the relevant Authority⁴ to ensure you are appropriately authorised to conduct the role as required by applicable legislation⁵.

We do not envisage transferring the personal information we collect about you outside of Gibraltar or the EU.

We take the security of your data seriously. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Gibraltar Regulatory Authority of a suspected breach where we are legally required to do so.

Data Retention

If your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file. The periods for which your data will be held will be detailed in the Employee Privacy Notice.

³ GDPR Article 9 2 (h)

⁴ Gibraltar Financial Services Commission (Regulated Individuals) or Legal Services Regulatory Authority (Provision of Legal Services).

⁵ Financial Services Act (Regulated Individuals) or the Legal Services Act (Provision of Legal Services).



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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 us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact either a member of the HR team (hr@fid.gi) or our Data Protection Officer (compliance@fid.gi).

If you believe that we have not complied with your data protection rights, you can complain to the Gibraltar Regulatory Authority:

+350 20074636

info@gra.gi

Gibraltar Regulatory Authority
2nd floor, Eurotowers 4,
1 Europort Road,
Gibraltar.

Automated Decision Making

Recruitment is not subject to automated decision making.