

## What is the purpose of this document?

Daiwa Capital Markets Europe Limited is a “data controller”. This means that we are responsible for deciding how we collect, store and use personal information about you and this privacy notice describes how we do that during the recruitment process. It applies to you because you are applying to work with us (whether as a permanent or fixed-term employee, or as a contractor) either through an agency or directly and we are required by data protection law, being the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (**UK GDPR**) to provide you with this information.

## The kind of information we process about you

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

- information you have provided to us in your CV and covering letter and/or email;
- information about your current and/or expected level of remuneration, including benefit entitlements;
- information about your entitlement to work in the United Kingdom;
- any information you or your agent provide to us during the recruitment process;
- any information collected during background screening checks† (which may include criminal offence type data).

We may also collect, store and use (where you choose to provide it to us) “special categories” of more sensitive personal information such as race or ethnicity, political opinions, health, religious or philosophical beliefs and sexual orientation.

## How is your personal information collected?

We collect personal information about you from the following sources:

- You, the candidate.
- Obtained from your passport or other identity documents.
- Recruitment agencies, from which we collect the following data: CV, cover letter, contact details and salary expectations.
- Third party background screening services, from which they undertake checks in respect of criminal convictions, credit checks, previous employment and education checks, among other checks to verify your suitability for the role. †
- Where you are applying for a role in Technology, you may be asked to complete a training exercise via an external party who shall provide us with the results.

† *Daiwa will only seek information from these sources if a permanent or fixed term job offer has*

*been made to you and we will inform you that we are doing so.*

## How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, competencies, qualifications, and suitability for the role;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our hiring processes;
- Business management monitoring, strategy and planning;
- Comply with our legal or regulatory obligations;
- To maintain the physical security of our premises including by CCTV recording and keeping records of visits to our offices and issuing security passes;
- To administer and execute any contract that we enter into with you;
- ensure your health and safety in the workplace; and/or
- make reasonable adjustments for you during the interview process.

## Why we process your personal data

Our processing of your personal data for the purposes mentioned above is based:

- in part, on our legitimate business interests in evaluating your application to manage our relationship with you, to ensure that we recruit appropriate employees, and to evaluate and maintain the efficacy of our recruitment process more generally; and in operating our business and protecting DCME and its employees, clients, and third parties;
- in part, on our performing contractual and pre-contractual measures relating to our potential employment relationship with you;
- in part, on our complying with applicable law and regulation necessary to satisfy our legal and regulatory obligations including public health, workplace safety as well as being a financially regulated organisation; and
- in part, on your consent, if we offer you the opportunity to participate in our recruitment process or if we collect sensitive personal data for legally permitted purposes such as public health and workplace safety.

## If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## Processing your personal data

We will comply with data protection law and principles, which means that your personal data will be:

- used lawfully, fairly and in a transparent way;

- collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

## Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## Sharing your personal data?

### Internally

Your information may be shared internally within DCME for the purposes of the recruitment process and it may be seen by members of the recruitment team, other team members within the People & Culture team, and hiring managers. This includes interviewers involved in the recruitment process, managers in the business area with a vacancy and compliance staff if access to the data is necessary for the performance of the role.

### Externally

We use:

- a third-party applicant tracking system which securely stores your personal information for us once you have made an application in order to enable the relevant hiring managers and recruiters to consider your application,
- third party providers to carry out reference checks, credit checks, and other screening checks in the event you accept an offer of employment from us,
- other organisations that process data on our behalf, such as those that support the business in administration eg. insurers, IT services, payroll services, banks etc, as well as being a financially regulated organisation

We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

### Cross border transfers

The global nature of our business, as well as our suppliers means, that your personal information may be disclosed outside of the United Kingdom. Where we transfer your personal information outside the United Kingdom, the firm will ensure there are appropriate safeguards in place.

## How we protect your data

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

on a need-to-know basis. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Data will be stored in a range of different places, including on your application record, in the People & Culture management systems and on other IT systems (including email).

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

## How long will you use my information for?

If you accept an offer of employment with us, any relevant personal data collected during the recruitment process will become part of your personnel records and will be retained in accordance with the privacy notice applicable to our employees.

Otherwise, we will retain your personal information for a period of six (6) months after we have communicated to you or your agent of our decision. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After six months, your personal data will be anonymised by removing the identifying information such as your name and contact details, but your application history will remain. This anonymised data is stored for twelve months in order to support internal governance processes. Thereafter, we will delete the remaining information in accordance with our data retention policy. Deletion of your personal information will involve deletion of the data from our active electronic files and beyond the use of those staff involved in the recruitment process, however this may be retained on our back-ups in order to comply with other legal and regulatory obligations.

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 consent to retain your personal information for a fixed period on that basis.

## Your rights

In certain circumstances, you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information (commonly known as the right to be forgotten). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

In addition, where you have provided consent to us processing your personal information for the purposes of the recruitment exercise, you have the right to withdraw your consent for processing for that purpose at any time.

You are under no obligation to provide personal data to us during the recruitment process, but if you do not provide the required information, we may not be able to process your application fully or at all.

## Contact us

If you have any questions about this privacy notice, how we handle your personal information or you wish to exercise any of your rights, please contact the Head of Privacy at [headofprivacy@uk.daiwacm.com](mailto:headofprivacy@uk.daiwacm.com). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for DCME or another supervisory authority in your home territory, but we would appreciate the opportunity to see whether we can address your concerns in the first instance.

## Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time. The last version of this notice was issued in October 2022.