

Data Protection Privacy Notice (Recruitment)

Cannon Asset Management

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Cannon Asset Management Limited (the 'Company') is a Guernsey registered entity based in Guernsey, Channel Islands. Our principal place of business is First Floor, Kingsway House, Havilland Street, St Peter Port, Guernsey, GY1 2QE.

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Notice describes the Company's policies and procedures regarding its collection and use of your personal data, and outlines your privacy rights. We recognise that information privacy is an on-going responsibility, and so we will from time to time update this Notice as we undertake new personal data practices or adopt new privacy policies.

For the purpose of the Data Protection (Bailiwick of Guernsey) Law, 2017 (**DP Law**) the Company is a 'data controller' and gathers and uses certain information about you.

Data Protection Officer

The Company has appointed an internal Data Protection Officer for you to contact if you have any questions or concerns about the Company's personal data policies or practices. The Company's Data Protection Officer's name and contact information are as follows:

Alison Hills
First Floor, Kingsway House, Havilland Street, St Peter Port, Guernsey, GY1 2QE.
Tel: +44 (0)1481726141 dpo@cannonhouse.com

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our **Data Protection (Employment) Policy**.

About the information we collect and hold

- **What information**

The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

- **Where information may be held**

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our **Data Protection Privacy Notice (Employment)**.

Your rights

The DP Law laws provide certain rights for data subjects. A good explanation of them is available on the website of the Guernsey Data Protection Authority (<https://dataci.gg/>).

You may have the following rights under the DP Law:

- Right of subject access: the right to make a written request for details of information about you held by the Company and a copy of that information.
- Right to rectification: the right to have inaccurate information about you rectified.

- Right to erasure ('right to be forgotten'): the right to have certain information about you erased.
- Right to restriction of processing: the right to request that your information is only used for restricted purposes.
- Right to object: the right to object to the use of your information, including the right to object to marketing.
- Right to data portability: the right, in certain circumstances, to ask for information you have made available to us to be transferred to you or a third party in machine-readable formats.
- Right to withdraw consent: the right to withdraw any consent you have previously given us to handle your information. If you withdraw your consent, this will not affect the lawfulness of the Company's use of your information prior to the withdrawal of your consent.

These rights are not absolute: they do not always apply and exemptions may be engaged. We may, in response to a request, ask you to verify your identity and to provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

To exercise any of these rights, or if you have any other questions about our use of your information, please contact the HR department.

Reasonable access to your personal data will be provided at no cost upon request made to the Company by email to the HR department or the Data Protection Officer. If access cannot be provided within a reasonable time frame, the Company will provide you with a date when the information will be provided. If for some reason access is denied, the Company will provide an explanation as to why access has been denied.

If you are unhappy with the way we have handled your information you have a right to complain to the data protection regulator where you live or work, or where you think a breach of your personal information has taken place.

In Guernsey, your local regulator is the Data Protection Commissioner (until May 2018). Their website is available at <https://www.dataci.org/>. From 25 May 2018 the Data Protection Authority will be your local regulator in Guernsey.

- **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We train all of our personnel about the importance of confidentiality and maintaining the privacy and security of personal data. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

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

- **Data Storage**

Your personal data is stored by the Company on internal IT systems, its servers, and on the servers of the IT-services company the Company engages, located in Guernsey. In addition, your data is held in hardcopy form in a secure paper filing system on Company premises.

Changes and updates to Privacy Notice

As our Company changes from time to time, this Notice is expected to change as well. We reserve the right to amend the Notice at any time, for any reason, without notice to you, other than to publish the amended Notice on our website. The provisions contained herein replace and supersede all previous notices, statements or provisions regarding our privacy practices, as of the Notice Version Effective Date 25 May, 2018.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Guernsey Data Protection Commissioner’s Office at <https://dataci.gg/> or email enquiries@dataci.org or telephone: +44 (0)1481 742074 for further information about your rights and how to make a formal complaint.

Schedule

About the information we collect and hold

Part A: Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (i.e. address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles,	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed	To make an informed recruitment decision

salary and working hours) and interests

decision to shortlist for interview and (if relevant) to recruit

Information regarding your criminal record

From you, in your completed application form

To comply with our legal obligations

To make an informed recruitment decision
To carry out statutory checks
For further information, see * below

Details of your referees

From your completed application form

Legitimate interest: to carry out a fair recruitment process

To carry out a fair recruitment process
Information shared with relevant managers, HR personnel and the referee

Part B: Before making a final decision to recruit

The information we collect

How we collect the information

Why we collect the information

How we use and may share the information

Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers

From your referees (details of whom you will have provided)

Legitimate interest: to make an informed decision to recruit
To comply with our legal obligations
Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice

To obtain the relevant reference about you
To comply with legal/regulatory obligations
Information shared with relevant managers and HR personnel

Information regarding your academic and professional qualifications

From you, from your education provider, from the relevant professional body

Legitimate interest: to verify the qualifications information provided by you

To make an informed recruitment decision

Information regarding

From you and from the

To perform the

To make an informed

your criminal record, in criminal records certificates	Guernsey police checks	employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you	recruitment decision To carry out statutory checks For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Guernsey Government	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Guernsey Government

You are required (by law or in order to enter into your contract of employment) to provide the categories of information above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle special category information including information relating to criminal convictions and offences are set out in our Data Protection (Employment) Policy and Staff Screening Guidance Note available from the HR department.