**RECRUITMENT PRIVACY POLICY**

***Global Privacy Policy***

This Policy contains important information about how FIL Investment Management Ltd (known together with its associated companies as Fidelity) and its associated companies (together “FIL”) will process your personal data in connection with your application for employment. You are asked to read the Policy carefully before completing the Background Vetting Form. In the event that you have any questions on this Policy, please contact us at [careers@fil.com](mailto:careers@fil.com).

1. **WHAT DATA WILL FIL COLLECT ABOUT ME AND WHY?**

FIL will collect your **personal data** as may be necessary to process your application for employment as part of its recruitment and selection procedure. This personal data will include (but is not limited to): your name, address and previous addresses, date of birth, employment history, education and qualifications, referees, hobbies, outside interests and memberships of professional bodies etc.

This information may be collected from a number of sources, including your CV, the Background Vetting Form, interview notes, correspondence and any other documents generated during the recruitment process.

The primary purpose for processing your personal data is to consider your application for employment as part of FIL’s recruitment process. In the event that your application for employment is successful, this data may also be retained and processed for the purpose of the ongoing employment relationship (further information on this processing will be provided to you as needed). Finally, as explained below, the information which you provide may also be used to assess your suitability for employment as part of FIL’s background vetting procedure.

***Sensitive Personal Data***

Certain information about an individual is known as **sensitive personal data**. FIL may process your sensitive personal data during the recruitment process as follows:-

* **Criminal convictions and pending proceedings –** subject to Regional/Country legislation and local data protection and privacy laws.
* **Medical conditions and disabilities –** subject to Regional/Country legislation and local data protection and privacy laws.
* **Equal Opportunities Monitoring –** subject to Regional/Country legislation and local data protection and privacy laws.

1. **HOW WILL FIL USE MY PERSONAL DATA?**
2. ***Recruitment and Selection***

Your personal data will be used by FIL’s HR Department, managers and other relevant employees during all aspects of the recruitment process, for example to assess your application, during any interview and when finalising any recruitment decision, to send your contract pack if your application is successful and to ask you to provide feedback on your experience throughout the recruitment process.

1. ***Background Vetting***

FIL considers it owes a duty to its customers, clients and business to ensure that it maintains the highest standards of honesty and integrity when recruiting for its workforce. As a result, it is FIL’s policy to undertake background checks on all applicants who are offered employment following the recruitment process.

**The checks described below will only be undertaken once a successful applicant has signed and returned an offer of employment.**

The checks are as follows:-

* Applicant’s identity and rights work;
* Consistency in information provided on CV’s, Interview Notes & BVF;
* Publicly Held Database checks - including international Database checks but not limited to;
* Credit/Directorship information;
* Verification of employment – over the previous 5 years *(or min of 2 employers)*;
* Verification of highest level of education*(attained at degree level or above, or any education attained within the last 5 years)*;
* Verification of professional certifications or affiliations that are relevant to the role to be undertaken;
* Verification of any relevant regulatory authorisations;
* Criminal Checks – role specific and/or where legislation allows.

The background vetting process may differ according to the country of employment and employment category, it is also necessary to adhere to strict Data Protection requirements.

It is essential that you complete the Background Vetting Form in full and that any information which you provide on the Form (and otherwise during the recruitment process) is honest, accurate and not misleading. In the event that a discrepancy is discovered during the conduct of the background checks, an applicant will usually be given the opportunity to provide an explanation. However, all applicants should note that, should such explanation be unsatisfactory, or if FIL otherwise determines (in its absolute discretion) that the results of the background checks are a cause for concern, this could lead to any offer of employment being withdrawn or, where employment has commenced, the immediate termination of the employment relationship (including summary dismissal in appropriate cases). In line with the above, all offers of employment made by FIL are expressly conditional upon a satisfactory background check being completed in relation to each applicant.

1. **WHAT HAPPENS TO MY PERSONAL DATA?**
2. ***Access and Storage***

Documents containing your personal data will be accessed and stored by the following individuals:-

Managers and employees of the HR Department for the purposes of the recruitment and selection process - for this purpose, certain details will be stored on Fidelity's electronic Recruitment Database which operates on a global basis; managers and employees of the Investigations & Intelligence Department for the purposes of conducting background vetting checks (in relation to applicants who have accepted an offer of employment); and managers and employees who are otherwise directly involved in the recruitment process (e.g. line managers involved in the interviewing process).

In all cases, Fidelity takes appropriate steps to ensure that the documents are stored securely (whether in hardcopy or softcopy) and that access is restricted only to those employees with a legitimate purpose.

1. ***Transfer to third parties (including other FIL Group companies)***

In a very limited number of cases, an applicant’s personal data may be transferred to other third parties for the conduct of the background vetting checks. Such transfer will only take place (i) where an applicant has accepted an offer of a contract to provide services; and (ii) he/she has worked or resided abroad for a significant period within the last five years. In this event, personal data may be transferred as follows for assistance with the conduct of the background vetting checks (third party/relevant location(s)): HireRight; UK and Poland (Europe), FMR Corporation, Merrimack; (US, Canada), First Advantage (FADV); Tokyo (Japan), China, Hong Kong (Far East and Australia), Taipei (Taiwan) Delhi (India) and Verifacts Services Pvt Ltd; Gurgaon. In each case, the transfer takes places under the terms of an agreement which deals with the protection of your personal data.

1. ***Retention of personal data***

**Successful applicants** - If your application for employment is successful, any information which you have provided during the recruitment process will be retained only if it is relevant to the ongoing employment relationship. Full details of how FIL processes personal data during the employment relationship will be provided in due course as needed. Any other information which you have provided during the recruitment process will be destroyed within a period of no longer than 6 months following the satisfactory completion of the background vetting checks. This includes all documents generated during the conduct of background checks including the Background Vetting Form**,** although a summary note of the results of the checks and any significant points will be retained (along with any related documents).

**Unsuccessful applicants -** In the event that your application for employment is unsuccessful on this occasion, any information which you have provided during the recruitment process will be retained for a maximum period of no longer than 6 months in order to deal with any queries or issues relating to your application, following which it will be destroyed. The HR Department may write to an unsuccessful applicant to state that his/her CV will be retained on file for the purposes of future recruitment – individuals will be given the opportunity to object to their CVs being retained for this purpose at the relevant time.

**For candidates applying for roles in the UK**

1. **WHAT DATA WILL FIL COLLECT ABOUT ME AND WHY?**

FIL will collect your **personal data** as may be necessary to process your application for employment as part of its recruitment and selection procedure. This personal data will include (but is not limited to): your name, address and previous addresses, date of birth, employment history, education and qualifications, referees, hobbies, outside interests and memberships of professional bodies etc.

This information may be collected from a number of sources, including your CV, the Background Vetting Form, interview notes, correspondence and any other documents generated during the recruitment process.

The primary purpose for processing your personal data is to consider your application for employment as part of FIL’s recruitment process. In the event that your application for employment is successful, this data may also be retained and processed for the purpose of the ongoing employment relationship (further information on this processing will be provided to you as needed). Finally, as explained below, the information which you provide may also be used to assess your suitability for employment as part of FIL’s background vetting procedure.

***Sensitive Personal Data***

Certain information about an individual is known as **sensitive personal data**. FIL may process your sensitive personal data during the recruitment process as follows:-

* **Criminal convictions and pending proceedings –** The Background Vetting Form includes a number of questions relating to each applicant’s criminal convictions and pending proceedings. Whether in the UK or any other country where equivalent legal requirement under specific country jurisdictions. FIL requests and processes this information in order to monitor and maintain the honesty and integrity of its workforce, particularly in view of FIL’s range of business activities (including fund management).

When answering these questions on the Background Vetting Form, you do not have to declare any criminal convictions which are “spent” under the Rehabilitation of Offenders Act 1974 unless you are applying for a position which is covered by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 e.g. as a solicitor or a certified/chartered accountant. In this case, all convictions (both spent and unspent) and all pending proceedings must be declared. If you have any doubt over whether you must declare any spent convictions, please speak to your HR contact at FIL.

In addition, there are specific requirements relating to the declaration of “spent” criminal convictions and pending proceedings which are relevant if you are applying for an “approved persons” role (as defined by the Financial Services and Markets Act 2000). Please see section 4 below for further information.

* **Medical conditions and disabilities –** During the recruitment process each applicant is asked to provide details of any medical conditions which may be relevant to the job role in question.FIL will process this information in order to assess each applicant’s fitness for the role (in accordance with health and safety legislation). Applicants will also be asked for details of any disabilities to assist FIL to comply with its obligations to disabled persons under the Equality Act 2010.
* **Equal Opportunities Monitoring –** FIL is an equal opportunities employer and does not discriminate upon the basis of an applicant’s racial/ethnic origin, sex, pregnancy, marital or family status, sexual orientation, religion or belief, age or disability. FIL asks applicants to provide certain information on its Equal Opportunities Monitoring Form (on a voluntary basis) to assist it to monitor how its policy on equal opportunities is working in practice. Any information which you provide on this Form will be stored securely and used only for the purposes outlined in this paragraph. Further details on how FIL will use this information can be found in the introduction to the Equal Opportunities Monitoring Form.

1. **HOW WILL FIL USE MY PERSONAL DATA?**
2. ***Recruitment and Selection***

Your personal data will be used by FIL’s HR Department, managers and other relevant employees during all aspects of the recruitment process, for example to assess your application, during any interview and when finalising any recruitment decision.

1. ***Background Vetting***

FIL considers it owes a duty to its customers, clients and business to ensure that it maintains the highest standards of honesty and integrity when recruiting for its workforce. As a result, it is FIL’s policy to undertake background checks on all applicants who are offered employment following the recruitment process.

**The checks described below will only be undertaken once a successful applicant has signed and returned an offer of employment.**

The checks are as follows:-

* verification of the applicant’s identity;
* verification of the applicant’s right to work in the UK;
* confirmation of consistency in the information provided;
* evaluation of employment references over the previous five years (subject to a minimum of two employers);
* evaluation of character reference;
* verification of highest level of education attained at degree level or above, or any education attained within the last 5 years;
* verification of relevant professional certifications, qualifications or affiliations (if any);
* verification of any regulatory authorisations (if any)
* evaluation of Fraud Database checks;
* evaluation of a Criminal Records check (role specific)
* evaluation of publicly available credit information – i.e. a credit reference check; and
* evaluation of publicly available directorship information;

With regard to the last two checks listed above, this is limited to a “Non-Credit Application Search” of publicly available information such as the Electoral roll, the Postal Address File, the Association & Alias File and the Public Information File (which is based on information from the Registry Trust Ltd, Official Gazettes and the Insolvency Service). Details of County Court judgments, bankruptcies and Individual Voluntary Agreements (IVA’s) are also searched. Adverse findings will be highlighted and where necessary additional clarification and/or supporting documentation may be required to be provided.

It is essential that you complete the Background Vetting Form in full and that any information which you provide on the Form (and otherwise during the recruitment process) is honest, accurate and not misleading. In the event that a discrepancy is discovered during the conduct of the background checks, an applicant will usually be given the opportunity to provide an explanation. However, all applicants should note that, should such explanation be unsatisfactory, or if FIL otherwise determines (in its absolute discretion) that the results of the background checks are a cause for concern, this could lead to any offer of employment being withdrawn or, where employment has commenced, the immediate termination of the employment relationship (including summary dismissal in appropriate cases). In line with the above, all offers of employment made by FIL are expressly conditional upon a satisfactory background check being completed in relation to each applicant.

1. **WHAT HAPPENS TO MY PERSONAL DATA?**
2. ***Access and Storage***

Documents containing your personal data will be accessed and stored by the following individuals:-

* managers and employees of the HR Department for the purposes of the recruitment and selection process – for this purpose, certain details will be stored on FIL’s electronic Recruitment Database which operates on a Europe wide basis;
* managers and employees of the Investigations & Intelligence Department for the purposes of conducting background vetting checks (in relation to applicants who have accepted an offer of employment); and
* managers and employees who are otherwise directly involved in the recruitment process (e.g. line managers involved in the interviewing process).

In all cases, FIL takes appropriate steps to ensure that the documents are stored securely (whether in hardcopy or softcopy) and that access is restricted only to those employees with a legitimate purpose.

1. ***Transfer to third parties (including other FIL Group companies)***

If you accept an offer to provide services, your personal data will be transferred to Experian Limited as part of the background vetting checks as described in Section 2(b) above. This transfer takes place under the terms of an agreement between FIL and Experian Limited which deals with the protection of your personal data.

In a very limited number of cases, an applicant’s personal data may be transferred to other third parties for the conduct of the background vetting checks. Such transfer will only take place (i) where an applicant has accepted an offer of a contract to provide services; and (ii) he/she has worked or resided abroad for a significant period within the last five years. In this event, personal data may be transferred as follows for assistance with the conduct of the background vetting checks (third party/relevant location(s)): HireRight; UK and Poland (Europe), FMR Corporation, Merrimack; (US, Canada), First Advantage (FADV); Tokyo (Japan), China, Hong Kong (Far East and Australia), Taipei (Taiwan) Delhi (India) and Verifacts Services Pvt Ltd; Gurgaon. In each case, the transfer takes places under the terms of an agreement which deals with the protection of your personal data.

FIL may share your personal information with third parties and other organisations for any of the following purposes:

(a) compliance with any legal or regulatory requirements; (b) to protect FIL and its customers from theft and fraud.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud protection agencies. Law enforcement agencies may access and use this information.

1. ***Fraud Prevention***

Your details will also be checked with/against fraud prevention databases. Further details of these fraud prevention databases can be provided by the Background Vetting team.

A further consequence of an employee being found, in the reasonable opinion of FIL having followed a reasonable investigation, to have committed fraud or any other criminal offence against FIL, any third party or any other person (employed or engaged by FIL or otherwise), when applying for or during the course of your employment with FIL, is that this will be recorded by FIL on the relevant external fraud prevention databases. Such fraud prevention databases have been established for the purpose of allowing organizations to share data on their employment fraud cases.

This information may be accessed from the UK and other countries and used by law enforcement agencies and by FIL and other organizations to prevent fraud. The background vetting team, contactable at [fil.background.vetting@fil.com](mailto:fil.background.vetting@fil.com) can provide you with further details of the relevant fraud prevention databases on which FIL shares information.

1. ***Retention of personal data***

**Successful applicants** - If your application for employment is successful, any information which you have provided during the recruitment process will be retained only if it is relevant to the ongoing employment relationship. Full details of how FIL processes personal data during the employment relationship will be provided in due course as needed. Any other information which you have provided during the recruitment process will be destroyed within a period of no longer than 6 months following the satisfactory completion of the background vetting checks. This includes all documents generated during the conduct of background checks including the Background Vetting Form**,** although a summary note of the results of the checks and any significant points will be retained (along with any related documents).

**Unsuccessful applicants -** In the event that your application for employment is unsuccessful on this occasion, any information which you have provided during the recruitment process will be retained for a maximum period of no longer than 6 months in order to deal with any queries or issues relating to your application, following which it will be destroyed. The HR Department may write to an unsuccessful applicant to state that his/her CV will be retained on file for the purposes of future recruitment – individuals will be given the opportunity to object to their CVs being retained for this purpose at the relevant time.

1. **WHAT IF I AM APPLYING FOR AN “APPROVED PERSONS” ROLE?**

If you are applying for an “approved persons” role as defined by the Financial Conduct Authority (FCA) or Prudential Regulation Authority (PRA) you should complete the Background Vetting Form in full and ensure that all information which you provide on the form (and otherwise during the recruitment process) is honest, accurate and not misleading. If relevant, at an appropriate stage during the recruitment procedure, you will be asked to complete the Regulatory application form and other documentation relating to your Approved Persons status.

There are special provisions which apply to the declaration of criminal convictions and pending proceedings if you are applying for an “approved persons” role as follows:-

* you must provide details of all criminal convictions which are “unspent”; **and**
* you must provide details of all criminal convictions (**whether “spent” or “unspent**” any convictions, cautions, reprimands or final warnings which would not be filtered/Protected in line with current guidance) – which also involve fraud, theft, false accounting, offences against the administration of public justice (such as perjury, perverting the course of justice and intimidation of witnesses or jurors), serious tax offences or other dishonesty or an offence (whether or not in the United Kingdom) relating to companies, building societies, industrial and provident societies, credit unions, friendly societies, insurance, banking or other financial services, insolvency, consumer credit or consumer protection, money laundering, market manipulations or insider dealing; **and**
* you must provide details of all current criminal proceedings to which you are subject.

You should provide this information both when completing the Background Vetting Form and any other relevant documents, you will be required to complete in order to comply with all legislative and regulatory requirements as are relevant to your Approved Persons status.