**Privacy Statement**

Your privacy is important to us. This privacy statement covers the data collected during the recruitment process. The recruitment process may start with the registration and attendance at a career / marketing event as well as searching and applying for jobs and then the progression of your job application through the process to the point of hire.

In this policy, ‘we’, ‘our’ and ‘FIL’ means the FIL Group company to which you are applying for a role. If you are applying for a role in England, this will be Fidelity Investment Management Limited (registered in England and Wales with company number 02349713), 25 Cannon Street, London EC4M 5TA. If you are applying for a role in Ireland, this will be FIL Transaction Services Limited (registered in Ireland with company number 387165), Georges Quay, 43 Townsend Street, Dublin 2 D02 VK65.

We have a dedicated Data Protection Officer, Caroline Hart who is responsible for data compliance issues. If you have any questions about this policy, please contact her using the email address [Caroline.Hart@FIL.com](mailto:Caroline.Hart@FIL.com).

This privacy statement explains what personal data we collect from you during the recruitment process, through our interactions with you and how we use that data.

We expect to collect a lot on information about you during the process and we require some information which we can communicate, make recruitment decisions, and complete a contract of employment. We may ask for other optional information to help us deliver a better recruitment experience.

Where information is optional, we will need your consent to collect the information and we will make this clear during the recruitment process. If you do not choose to give consent, or you choose not to supply optional information, then this will not impact the recruitment decisions we make about you. If you choose to give consent to the collection of optional information, you may withdraw this consent at any time. Please bear in mind that we may process the same information about you for different purposes and we may have another legal basis for continuing that processing, even if you withdraw your consent (for example, we may have a legal obligation to continue processing it).

**Personal Data We Collect**

During the recruitment process we may ask you to provide information, we may record other sources of information about you (e.g. feedback from recruiters), and we may infer or derive other data (e.g. determine your location from your postal code or count up the number of languages you speak). The types of collated information include:

**Personal Contact**

Names, e-mails, address, phone numbers etc.

**Screening/Selection Information**

Your CV / Resume, education results, work experience, significant achievements, etc.

Some of this information would not be personal to you if all other fields were anonymised e.g. your location preference is considered personal data while linked to other personal contact information but it cannot be used to personally identify you its own. Some of this information may include enough information to personally identify you e.g. your CV/Resume.

**Evaluation Data**

Information provided by other people involved in the recruitment process about your suitability for employment and your status within the recruitment process.

**Your feedback on the recruitment process**

Optional information provided by you about your views on the recruitment process.

**Special Requirements**

Optional information provided by you e.g. medical needs, dietary requirements, disability, dyslexia, study abroad.

**Candidate Contractual Information**

Information provided by you which is required for final contract (in addition to Personal Details). Includes acceptance of offer.

**Other Contractual Information**

Information added by us in order to draw up contract e.g. salary, job title, hours.

**On-Boarding Information**

Additional information supplied by you in order to complete the hiring process and may include bank details, identification documents, proof of right to work, next of kin, etc.

**Equal Employment Opportunity (EEO) Information**

Gender, Race, Religion, Veteran, Disability, or other diversity information

**How We Use Personal Data**

*Personal Contact data* is used to communicate with you during the recruitment process.

*Screening/Selection data* is used to decide on your suitability for jobs that you apply to or to identify jobs for which we think you may be more suitable.

*Evaluation data* is used to record our assessment of your suitability for jobs that you are being considered for and your status within the recruitment process.

*Your Feedback data* is used by us to improve the recruitment process for future candidates.

*Special Requirements data* is used by us to make accommodation in the recruitment process for any needs you may have.

*Candidate Contractual Information and Other Contractual Information* is used to compile contractual documentation (e.g. job offer and contract) and to record the contract. If you accept an offer of employment then some of this data will be transferred to other systems that we control (e.g. payroll systems).

*On-Boarding Information* is used by us to prepare for you starting work with us including setting up payroll information, benefits, and proof of right to work. If you accept an offer of employment then some of this data will be transferred to other systems that we control e.g. payroll systems.

*EEO Information* is used to monitor the recruitment process to ensure our recruitment practices are fair.

We may aggregate data with other candidate’s data in reports to help us monitor, improve, and plan our recruitment activities. These reports will not include personally identifiable information.

**Length of Time We Retain Your Data**

If you are successful and you accept an offer, the data may be retained throughout your employment and for a period after the end of employment. In this case you will be informed of further data retention policies as appropriate.

If you are not made an offer, or you do not accept an offer, then we keep the data, including personally identifiable data, for 1 year after the end of recruitment activity so that we can refer to it in case of queries over the recruitment process, including employment tribunals or other legal challenges.

After the 1 year retention period we will anonymise all your data. Any data that may contain personally identifiable information will be cleared. The data that we retain is used to report on the historical performance of our recruitment process.

**Data Security**

Documents containing your personal data will be accessed and stored by the following individuals: managers and employees of the relevant HR Department for the purposes of the recruitment and selection process - for this purpose, certain details will be stored on Fidelity's electronic recruitment portal Workday which operates on a global basis; and managers and employees who are otherwise directly involved in the recruitment process to the extent strictly necessary to assess your application, during any interview and when finalising any recruitment decision.

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.

**Reasons We Share Personal Data**

We share data with our group companies and other vendors working on our behalf. In such cases, we have written agreements with these companies and they abide by our data privacy and security requirements.They are not allowed to use personal data they receive from us for any other purpose. We may disclose personal data when required by applicable law or to respond to legal process.

We do not sell, rent, and trade your personal data.

We share your personal data with the following third parties for the reasons stated below:

* Hireright Ltd, Spitfire House, 141 Davigdor Road, Hove, Brighton, East Sussex BN3 1RE- Hireright conduct background vetting checks on our behalf.
* Workday Inc., The Kings Building, May Lane, Dublin 7, Ireland - Workday is our global HR system. Its data centres are in Dublin and Amsterdam, however your personal information may also be accessed by Workday in its US locations for maintenance and IT support purposes. Workday Inc. has self-certified to the EU-US Privacy Shield.

We use the European Commission’s model clauses (or other appropriate measures permitted by applicable data protection laws) in all our contacts with external service providers where those providers process personal data on our behalf outside of the EEA.

**Your rights: How to Access and Control Your Personal Data**

You have the right of access and the right to rectify the data concerning you. You can view much of your personal data through this website. You can request a copy of your personal data by contacting [early.careers@fil.com](mailto:early.careers@fil.com).

You can rectify or correct personal data if you find it is inaccurate or incomplete. Much of the information can be updated by you using WCN’s website. If there are other changes that you need to make then you can provide details of changes to [early.careers@fil.com](mailto:early.careers@fil.com). The right of rectification can only apply to factual data processed within the recruitment process. Data related to the screening / selection criteria cannot be rectified after the closing date of submitting applications as this data is used at that time to make decisions and needs to be preserved in that state as evidence in case of challenges to the fairness of the process.

In certain circumstances, you may object to us processing your personal data or request that processing be restricted. Please note that FIL may have a legal or other mandatory obligation to process your data.

You may also request that we transfer your personal data to another party, subject to exceptions (for example where we have collected the data under our legal obligations).

**Cookies and Other Similar Technologies**

WCN’s website uses cookies to distinguish you from other users of the website or as part of the security of this site. A cookie is a small file of letters and numbers that we put on your computer.

Any cookie we set will only contain random but unique information which is set to expire when you close the browser. The cookie does not contain any personal or sensitive information.

The cookie information can only be used by the browser when it sends requests for new web pages to our servers - the browser will not allow the cookie to be used for any other purpose. The cookie information will always be protected by strong encryption whenever the content is sent to us.

The use of these cookies is strictly necessary for the correct and secure operation of WCN’s website.

Cookies which WCN may set include:

request\_token: This may be set for users visiting \*.wcn.co.uk domain.

wcn\_status: This may be set for users visiting \*.wcn.co.uk domain.

wcn\_session: This may be set for users visiting \*.tal.net domain.