

Job Applicant Privacy Notice (compliant with GDPR)

June 2018

As part of any recruitment process, Inter Fund Management S.A. (“IFM”, “we”, “our” or “us”) collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information do we collect?

IFM collects a range of information about you. This includes, but not limited to:

- your name, address and contact details, including email address and telephone number;
- family information (e.g. marital status and number of children);
- education and employment information (e.g. remuneration, bonus, pension entitlements, insurance and other benefits information, employment dates such as dates of hiring/promotion/position change, performance evaluation, position information such as position title and reference number, attendance information including illness or leaves of absence, language skills);
- national registry number, social security number or local equivalent;

In some cases, the personal data that we process may also include special categories of data, such as diversity related information or health data (such as sickness records, etc.) and data about alleged or proven criminal offences depending on the applicable local laws and requirements.

IFM may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

IFM may also collect personal data indirectly from recruiters or third parties from who perform backgrounds checks for us, from other administration, or from publicly available sources.

Why does IFM process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations.

IFM has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

If your application is unsuccessful, IFM may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time.

How does IFM protect data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does IFM keep data?

If your application for employment is unsuccessful, and if you agree to allow us to keep your personal data on file, we will hold your data on file for consideration for future employment opportunities.

If you do not provide your consent, or once you withdraw your consent, your data is deleted or destroyed. You will be asked when you submit your CV whether you give us consent to hold your details in order to be considered for other positions or not.

If your application for employment is successful, personal data gathered during the recruitment process will be retained during your employment and for a minimum of 5 years or more after termination of employment depending on the local jurisdiction.

Your rights

Individuals whose personal data is processed by IFM have certain legal rights in respect of the information. These include:

- request the erasure of your personal data;
- request the restriction of the processing of your personal data;
- withdraw your consent where IFM obtained your consent to process personal data (without this withdrawal affecting the lawfulness of processing prior to the withdrawal);
- object to the processing of your personal data for direct marketing purposes;
- object to the processing of your personal data for other purposes in certain cases where IFM processed your personal data on another legal basis than your consent.

If you would like to exercise any of these rights, please contact complianceteam@ifm-sa.eu.

If you are not satisfied with our response, you have the right to make a complaint to the competent data protection authority:

Search at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to IFM during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Updates

This notice may be updated periodically and without prior notice to reflect changes in IFM's personal information practices. IFM will post the updated version on its website and indicate at the top of the notice when it was most recently updated.