

## **Candidate Privacy Notice – Terms of Use**

**HFM Group** respects your privacy and is committed to protecting your personal data at all times. HFM Group, includes all subsidiaries of HF Markets Holdings Ltd and all companies entitled to use the trademark 'HFM' (hereinafter the "Company" or "we" or "us"). For the purposes of this notice, HFM Group is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice affects you because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

### **DATA PROTECTION PRINCIPLES**

We will comply with data protection law and principles, which means that your 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 any 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.
- Kept securely.

### **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

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

- The information you have provided to us in your curriculum vitae.
- The information you have provided on our application form, including name, email address, phone number and spoken languages.
- Any competency test(s) you have undertaken as per our request and provided to us together with your application, if required for the position.
- Any information you provide to us during an interview.

### **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect your curriculum vitae.
- Your named referees, from whom we collect the following categories of data: employment letter

from former employer(s), reference letter (if required), tax certificate from previous employer or last pay slip.

- From publicly available sources such as LinkedIn, from which we collect any information contained in your account.

## **HOW WE WILL USE INFORMATION ABOUT YOU**

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

- Assess your skills, qualifications, and suitability for the job position for which you have applied.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to assess your suitability for the relevant job position and to ensure that we recruit appropriate candidates for the Company.

We also need to process your personal information to decide whether to enter into a contract with you.

### **Legal basis for processing**

We rely on the following legal bases when processing your personal data:

- Legitimate interests, to assess your suitability for employment;
- Steps prior to entering into a contract;
- Compliance with legal obligations;
- Your consent, where applicable (e.g., retention for future roles).

Having received your CV and, where required, the results from the competency test which you have taken, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out a declaration of a clean criminal record (only to the extent that it is necessary for that role and provided that it is permitted by law) and/or carry out any other check before confirming your appointment.

### **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.

## **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We process particularly sensitive personal data only where it is necessary and permitted by law, including::

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your nationality, to assess whether a work permit and a visa will be necessary for the role.

Such data will be processed in accordance with applicable data protection laws and subject to appropriate safeguards, including where necessary your explicit consent or to comply with employment law obligations.

## **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We will process information about criminal convictions.

More specifically, we will collect information about your criminal convictions history if we would like to offer you a role for which a clear criminal record is required by law. Any such processing will be carried out to comply with legal or regulatory obligations and to assess your suitability for specific roles..

## **INFORMATION ABOUT INSOLVENCY**

We will process information about your insolvency status.

We shall collect information about your insolvency status if we would like to offer you a role for which an insolvency status is required by law. We are required to carry out an insolvency status check in order to ensure that there is nothing in your financial history which makes you unsuitable for the role.

## **INFORMATION ABOUT THE CANDIDATE APPLICATION PROCESS**

Please note that it is our company policy not to provide unsuccessful candidates with detailed reasons as to why they were not successful. Candidates who have not been invited for an interview should infer that they will not be shortlisted for the position. Once the interview stage has been completed, we will contact the candidate(s) to notify them whether they have been selected for the relevant position or not.

## **AUTOMATED DECISION-MAKING**

We may use automated decision-making tools to assist in the initial screening of candidate applications.

However, no decision that significantly affects you will be based solely on automated processing without human involvement.

## **DATA SHARING**

We may share your personal data with third parties where necessary to fulfil our legal obligations, comply with regulatory requirements, or protect our legal rights. Additionally, data may be shared with trusted service providers who assist in our operations. Any such sharing is conducted in accordance with applicable data protection laws, and we will notify you of any significant changes to these practices by updating this Privacy Notice or contacting you directly.

## **DATA SECURITY**

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

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.

## **DATA RETENTION**

### **How long will you use my information for?**

We will retain your personal information for a period of twelve (12) months after we have communicated to you our decision about whether to appoint you to role. 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 this period, your personal data will be securely deleted or anonymised in accordance with our data retention policies.

If your application has been unsuccessful and you wish us to delete any personal data you have provided us with during the recruitment process you can send us an email requesting the deletion of your account and any personal data from our systems.

It might be possible that you wish us to retain your personal data on file for longer than twelve (12) months, on the basis that a further opportunity may arise in the future, for which you wish us to consider you as a candidate. In such a case, we will request your explicit consent to retain your personal data for a fixed period of two (2) years on that basis. Please ensure that your data is kept up to date at all times by logging into the online system.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your rights in connection with personal information**

Under certain circumstances, by law 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 and to check that we are lawfully processing it.

- **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. 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.
- **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.
- **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.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please send us an email with your request.

We will respond to all legitimate requests within one (1) month, unless an extension is required in accordance with applicable law.

## **RIGHT TO WITHDRAW CONSENT**

You have the right to withdraw the consent you gave us in relation to keeping your personal information, at any time. To withdraw your consent, please send us an email expressing your wish to withdraw your consent. Once we have received notification that you have withdrawn your consent, we will no longer contact you for any future vacancies or process your personal data in any other way and we will dispose of your personal data securely.

## **DATA PRIVACY**

If you have any questions about this privacy notice or how we handle your personal information, please send us an email as per the details in the contact us section. You have the right to make a complaint at any time to the Data Protection Authority of your country.

## **CONTACT US**

You can contact us at the following email address: [candidateprivacy@hfm.com](mailto:candidateprivacy@hfm.com)

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