

Canary Wharf Group Privacy Notice for Candidates

1. Introduction

We, **Canary Wharf Group plc and all associated group companies ("Canary Wharf Group")** of One Canada Square, Canary Wharf, London, E14 5AB, the **Data Controller**, are committed to respecting the privacy of individuals. This notice outlines how we collect and use your personal information, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

If you have any queries in relation to this notice, or need more information please do not hesitate to contact us at:

Data Protection Canary Wharf Group One Canada Square Canary Wharf London E14 5AB

Or email us at DataProtection@canarywharf.com

2. Why do we collect personal information about you?

Canary Wharf Group manages and delivers construction projects as a project manager and/or main contractor for Canary Wharf Group. We therefore need to collect certain information in order for you to register your interest in current or future employment with Canary Wharf Group, keep you informed of employment opportunities and process any application made by you for the job roles you apply for. We may also use your information to contact you from time to time for your feedback on your experience in order to improve the services we offer.

The term "personal information" in this notice refers to information that does or is capable of identifying you as an individual, for the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR").

Where appropriate and in accordance with local laws and requirements, we may also collect more sensitive personal information about you to comply with our equal opportunity obligations.

3. What Personal Information may we collect about you?

We only ask for details that will genuinely help us to assist you with the recruitment process, such as:

- Your name, title, aliases;
- Your contact details (including, addresses, telephone numbers and email addresses);
- Demographic information such as gender, age, date and location of birth, nationality, marital status, social mobility, veteran status;
- Information contained within your CV or cover letter including, education/work history, academic/professional qualifications, employment details, hobbies, any family dependencies;
- Information collected during interviews and/or telephone conversations;
- Information provided by your nominated references;

- Information about your citizenship and your right to work in the UK
- Sensitive information relating to your mental and physical health, medication/treatment received, race or ethnic origin, data asking for sexual orientation, trade union affiliation or religious beliefs for monitoring the fairness of Canary Wharf Group's recruitment process, to provide you with the necessary support when attending Canary Wharf Group sites;
- Any spent or unspent convictions and/or cautions to assess your suitability for a job role or for provision of access to sites where enhanced security is required;
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our recruitment business activities, including but not limited to, CCTV footage, logs of visitors, logs of accidents and injuries.

4. How do we collect your personal information?

We collect personal information in three primary ways:

(i) Personal information that you, the candidate, give to us.

There are numerous ways you can share your information with us. These may include:

- Entering your details on our website or via an application form as part of the recruitment process;
- Emailing your CV to a member of the recruitment team; or
- Applying for jobs through our website.

(ii) Personal information that we receive from other sources.

We may receive personal information about you from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal information received in the following situations:

- Your referees may disclose personal information about you; and
- We may obtain information about you from searching for potential candidates from third party sources, such as LinkedIn and other job sites.

(iii) Personal information that we collect automatically.

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically through cookies or through you providing it to us. Please see our cookie policy <u>here</u>

5. How do we use your Personal Information?

We use your information to:

- Process your application and keep you informed throughout the recruitment process;
- Verify your identity;
- Assess you skills and qualifications against the criteria for the job you have applied for;
- Contact your nominated references;
- Keep you informed of new vacancies within Canary Wharf Group which you may be interested in;
- To contact you for feedback on your experience in order to help us improve the services we provide to our candidates;
- Processing of information about race, ethnic origin, religious beliefs or sexual orientation to ensure fairness and equality in our recruitment process and to comply with our equal opportunity; obligations, monitor the diversity of recruitment process and for statistical and research purposes;
- Processing of sensitive health information with regards to your physical or mental wellbeing, where the processing is undertaken for the purpose of our assessment of your suitability for job roles or working capacity, or for the provision of medical products or medical devices, to assist you when attending Canary Wharf Group sites, or where processing is necessary for the purpose of obligations or rights under employment, social security or social protection law.

6. Who has access to your Personal Information?

Your information will be processed by employees of Canary Wharf Group in order to fulfil our obligations to you as outlined in this notice. We may also share your details with third parties including:

• Contractors working on behalf of or in partnership with Canary Wharf Group;

- Our third-party suppliers/service providers who perform functions on our behalf under contract, support our systems, operations and processes;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this information, for example where processes and system are being compliance assessed by Canary Wharf Group's corporate audit or their representatives;
- Law enforcement or other regulatory bodies who can legally request access to information about you for prevention and detection of crime, the apprehension or prosecution of offenders, and the assessment or collection of tax.
- If we merge with or are acquired by another business or company in the future, we may share your personal information with the (prospective) new owners of the business or company.

7. Information security and International Transfers

Canary Wharf Group is committed to being transparent and taking all reasonable and appropriate steps to keep your personal information secure and to protect it from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

We are also obliged to tell you where we use services that transfer your information internationally. At Canary Wharf Group we have a strict selection process when it comes to our suppliers/ service providers and we enforce strict requirements within our contracts to ensure your personal information is stored and transferred in a way which is secure.

Canary Wharf Group does not operate outside the European Economic Area (EEA)*, and does not outsource any services to international suppliers outside the EEA. In the event that we do transfer personal information to service providers outside the EEA in the future, we will take all reasonable steps to ensure that your personal data is processed securely. We will only transfer personal information outside the EEA where it is compliant with applicable data protection legislation and the means of transfer provides adequate safeguards in relation to your personal information.

*The European Economic Area (EEA) currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein.

8. How long will you keep my Personal Information?

Information is only kept as long as necessary for the period it is required. When deciding how long we keep your information we take into account any minimum retention requirements set out in law. Canary Wharf Group will only use your information for as long as necessary. Canary Wharf Group's financial and statutory reporting requires information to be held for 7 years.

9. What rights do I have with regards to my Personal Information?

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest)
- The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.
- The right to data portability. You have the right to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if

we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

• The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within one month of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of £25 per request.

To exercise your rights please do so by writing to:

Data Protection Canary Wharf Group One Canada Square Canary Wharf London E14 5AB

Or email <u>DataProtection@canarywharf.com</u>

10. Consent

Where we need your consent to hold your information we will ask you to confirm your consent in writing and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject.

Where we do rely on consent you have the right to change your mind and withdraw that consent at any time by writing to us. If you withdraw your consent we will immediately cease using any personal information obtained and processed under that consent unless we have some other legal obligation to continue to use it.

11. What can I do if I'm not satisfied with how my Personal Information is processed?

At Canary Wharf Group we aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing robust measures to keep your information secure. If you are not satisfied with the information provided in this notice, please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

Alternatively it is your right to contact your local Data Protection Authority and lodge a complaint. In the UK the lead Data Protection Authority is the Information Commissioner. For more information please visit the Information Commissioner's office at <u>www.ico.org.uk/concerns</u> or call them on 0303 123 1113, or write to Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Canary Wharf Group's Use of Cookies

Canary Wharf Group utilise cookies to enhance your browsing experience, details can be found in our Cookies Policy available <u>here</u>.

Effective Date: 23 May 2018