

# Recruitment Privacy Notice - UK

By providing us with your data in connection with recruitment, you agree to the use by **StoneX Financial Ltd**, 1st Floor Moor House, 120 London Wall, London EC2Y 5ET ("**Company**", "**us**", "**our**" or "**we**") of the additional personal data which you voluntarily provided in the recruitment application, and which is collected during the recruitment process related to the job position offered by us.

You may withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before such withdrawal.

## **Who is the controller of your personal data?**

The Company is the controller of your personal data.

## **Which personal data is processed by us, for what purposes, on what legal basis and for how long?**

In principle, we obtain your personal data from the recruitment agency involved in the recruitment process or directly from you. We process the personal data contained in the recruitment application provided to us by such agency, data provided by you and generated during the recruitment process (during recruitment meetings, through competence tests). We may also process personal data obtained from background check services providers, or provided to us by a person who referred you to us or your employers (if you consent to our verification of your references) and the data included on publicly available professional and business websites, e.g. your LinkedIn profile, the website of a professional associations you are a member of, or in registers made available by public authorities.

We will process your data for the following purposes and on the following legal bases:

- (a) Your personal data such as identification data, contact details, education, professional qualifications and employment history, date of commencement of work, and remuneration is processed for the purpose of taking steps at your request before concluding the contract.
- (b) Your email address and phone number on the basis of our legitimate interests to conduct and manage recruitment in our recruitment system and through phone interviews. For this reason, if you choose to apply to us, we require you to provide us with your email address and phone number.
- (c) Data relating to the verification of your statements made in your application and during the recruitment process, in particular your competences, including data obtained from competence tests (e.g. information on your knowledge and skills), collected by us or a recruitment agency cooperating with us, collected from LinkedIn or other publicly available professional and business websites, in particular the websites of professional associations you are a member of, data contained in references from previous employers or obtained during interviews with employers (e.g. data concerning your skills) in order to pursue our legitimate interests.
- (d) Additional data that you decide to provide voluntarily to us, such as your image or information on your interests, we will process on the basis of your consent.

- (e) In case we need to repeat the recruitment process, we will process your data collected in connection with recruitment on the basis of our legitimate interests.
- (f) Where a recruitment agency is involved in your recruitment process, we process your identification data and information on your financial expectations on the basis of legitimate interests in order to perform a contract with that agency;
- (g) Data regarding any criminal convictions (including motoring convictions) you have or which are pending, if you have been made bankrupt (even if discharged), and whether you have any County Court Judgements, Individual Voluntary Arrangement or are subject to a Debit Relief Order on the basis of our compliance with our legal obligations as a regulated entity.
- (h) For future recruitment purposes for positions within the Company that match your qualifications based on your consent.  
If you have participated or will participate in more than one recruitment and you give us your consent to use the data collected also for future recruitment purposes, then - when conducting such future recruitment - we may use all data collected about you - as long as the one-year period for the processing of the data based on the given consent has not expired.
- (i) In exceptional cases, if any disagreement arises between you and the Company, for the purpose of pursuing and defending against claims, on the basis of our legitimate interests.

## **How long do we process your data for?**

We will process your personal data for the period necessary to carry out the recruitment process for the position you are applying for and to select a candidate, and thereafter, in case we need to repeat the recruitment or we identify another position we consider you to be suitable for. We will not process your data for these purposes for more than one year.

The provision of your personal data is necessary in order to take part in a given recruitment process. We may also need your data to take steps at your request to enter into a contract with you or for our legitimate interests. In such a situation, the provision of data is voluntary, but without it we may not be able to process your application. The provision of other data is voluntary.

## **How will we use your sensitive information?**

We will use your particularly sensitive personal information in the following ways:

- 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 or would need to be made during your employment.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. This information will be anonymised.

## **Information about criminal convictions**

We will process information about criminal convictions.

We will collect information about your criminal convictions history if we want to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for, or disbar you from, the role.

## **Who do we share your personal data with?**

We disclose personal data to data processors acting on behalf of the Company for:

- the provision of ICT services such as hosting, provision or maintenance of IT systems, in particular administrators of Internet recruitment portals, recruitment tools providers, HR support providers and other entities from our group acting on our behalf;
- conducting the recruitment processes - recruitment agencies (which may also act as independent controllers) and background check services providers.

We may disclose your personal data in the following cases:

- to persons providing references;
- to other entities from our group, if the recruitment to the position you are applying for is international and such other entities are involved;
- when such an obligation arises from the provisions of applicable law, in particular at the request of HMRC, the police and other governmental authorities;
- where it is necessary to meet our needs, in particular, to our consultants, auditors, postal operators and recruitment agencies.

## **Where will your personal data be processed?**

Your data will only be transferred outside the UK or EEA where this is required for the purposes of processing your application. We will also ensure that appropriate data transfer mechanisms are in place to protect such transfers as required by applicable data protection laws.

It is possible to obtain a copy of appropriate safeguards or more information on our data transfer strategy by contacting us.

## **What are your rights in connection with our processing of your personal data?**

You have the right to:

- access your data,
- rectify your data,
- request their deletion,
- request the restriction of their processing,
- object to the processing (where we process your data on the basis of legitimate interests),

- transfer the data you have provided (the processing of which you consented to, or which you have provided to conclude a contract) to another data controller,
- withdraw your consent to the processing of personal data at any time. The withdrawal of your consent shall not affect the lawfulness of the processing based on consent before its withdrawal.
- You also have the right to lodge a complaint with the Information Commissioner's Office.

### **How can you contact us?**

If you have any questions, wish to withdraw your consent, or exercise your rights, please contact us by sending an email to: [DPO@StoneX.com](mailto:DPO@StoneX.com) or by post to the Company's registered address above marked "Personal Data".