



## **CANDIDATE PRIVACY POLICY**

FundApps is committed to protecting the privacy and security of personal information. This duty extends to all persons whom we come to contact with and as a controller of personal information, we are responsible for deciding how we hold and use such personal information about those persons.

### **Purpose**

You are reviewing this privacy policy because you are applying for a job with FundApps. This policy aims to make you aware of what personal information we collect and how we use it as part of our recruitment process.

We will only process your personal information in accordance with this policy and relevant data protection legislation.

### **Data protection principles**

We comply with data protection laws 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 and how it is collected**

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

<b>Categories of Personal Information</b>	<b>Source</b>
<ul style="list-style-type: none"><li>● Name and title.</li><li>● Address.</li><li>● Contact details such as telephone number and email address.</li><li>● Employment history.</li></ul>	<ol style="list-style-type: none"><li>1. You, the candidate via your curriculum vitae, covering letter, application form, interviews and tests conducted as part of the recruitment process.</li></ol>

<ul style="list-style-type: none"> <li>• Compensation history.</li> <li>• Qualifications.</li> <li>• Leaving date and reasons for leaving your previous job.</li> <li>• Right to work documentation which may include a copy of your passport/ID cards and other government issued documentation.</li> <li>• References.</li> <li>• Government identification numbers such as social insurance or other national insurance number.</li> <li>• Where relevant, scores or other forms of results from tests.</li> <li>• Any other information you provide to us during the recruitment process.</li> <li>• Video/call recordings of interviews.</li> </ul>	<ol style="list-style-type: none"> <li>2. Any recruitment agencies that we use from time to time to advertise job roles on our behalf.</li> </ol>
<ul style="list-style-type: none"> <li>• Name, title, address and contact details including copies of any identity documentation which may state your date of birth and gender.</li> <li>• Education history (e.g. institutions attended, degrees, qualifications or certifications earned).</li> <li>• Adverse financial history (e.g. History of bankruptcy, insolvencies, voluntary arrangements, administration orders, or money laundering).</li> <li>• Criminal convictions, where necessary (e.g. unspent convictions, cautions, reprimands and final warnings held on central police records).</li> <li>• Employment history (including any directorships).</li> </ul>	<ol style="list-style-type: none"> <li>1. Any background check provider as they may change from time to time.</li> <li>2. The Disclosure and Barring Service in respect of criminal convictions or an international equivalent depending on the country.</li> <li>3. Any credit reference agency as they may change from time to time.</li> </ol>
<ul style="list-style-type: none"> <li>• Your employment history including dates of employment, title and performance information.</li> </ul>	<p>Your named referees</p>

<ul style="list-style-type: none"> <li>• Name and title.</li> <li>• Address.</li> <li>• Contact details such as telephone number and email address.</li> <li>• Employment history.</li> <li>• Educational history.</li> </ul>	Social media and job board websites such as LinkedIn, Glassdoor, myGWork and other sites that we may use from time to time via which you submit your curriculum vitae, covering letter or application form or that is publicly accessible.
Sensitive personal information about: <ul style="list-style-type: none"> <li>• Your race or ethnicity, religious beliefs, sexual orientation and political opinions.</li> <li>• Your health, including any medical condition, health and sickness records.</li> <li>• Any criminal convictions and offences.</li> </ul>	You, the candidate.

### 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 role.
- Determining the terms on which you work for us.
- Carry out right to work, 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 appoint you to the role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether you meet the basic requirements to be shortlisted for the role and if so, whether to enter into a contract of employment with you.

If you do meet the basic requirements, 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 conduct reference, background, criminal and credit checks 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, 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 sensitive personal information

We will use your 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 an interview or test (if applicable).
- We will use information about your race, national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. We will only receive this information if volunteered by you and in an anonymous format.
- We will collect and process information about your criminal convictions in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. We are contractually required to carry out criminal records checks by our clients for those candidates who are applying for a role that requires access to highly confidential client information and therefore a high degree of trust and integrity. Where this applies, we will seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

### Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### Data sharing

We will only share your personal information with the following third parties for the purposes of processing your application and as part of our recruitment process:

<b>Third Party</b>	<b>Service</b>	<b>Location</b>
Zinc Work Ltd	Background check provider that conducts pre-screening checks such as digital identity validation, verification and right to work	United Kingdom
Metaview Global Ltd	Productivity tool that automatically generates interview notes of screening calls	UK, EU and USA
Lever Inc	Recruitment – applicant tracking system	USA

Rio Group	The Rio group includes FundApps Limited (UK), FundApps Pte Ltd (Singapore), FundApps Inc (USA), SteelEye Limited, SteelEye US Inc., SteelEye Singapore Private Limited, SteelEye Portugal Unipessoal, LDA, and SteelEye India Private Limited. You may be interviewed by any employee in the Rio group.	USA, UK, Portugal, India, and Singapore
-----------	---	---

Rio Group Bidco Limited is the parent company for the FundApps group and affiliated company, SteelEye Limited, and its group of companies.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies.

Any sharing of personal information with third parties is governed by a data sharing agreement, ensuring they: (a) do not use your personal information for their own purposes; (b) take appropriate security measures to protect your personal information; (c) are only permitted to process your personal information for specific purposes and in accordance with our instructions. Furthermore, we require all third-party service providers to go through our due diligence process where we assess the suitability of their security, data and legal frameworks.

### **Transferring information outside of your home jurisdiction**

We may transfer the personal information we collect about you inside and outside of your home jurisdiction to the USA, UK, Portugal, EU, India, and Singapore where our group of companies and third-party suppliers are located in order to assess your suitability for the role.

There are adequacy regulations in place in respect of some of the countries listed. This means that when we transfer your data from, for example, the UK to the US and vice versa, such transfer is deemed to provide an adequate level of protection for your personal information.

For countries where adequacy regulations are not in place, we ensure a similar degree of protection is afforded to such transfer by putting in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with, and which respects the laws on data protection:

- Where we use certain service providers, we may use specific contracts approved for use in your home jurisdiction which give personal information the same protection it has in your home jurisdiction.
- We will conduct transfer risk assessments and data protection impact assessments where applicable to identify and minimise any risks associated with such third-party processing and transferring any personal information.

Please contact us at [privacy@fundapps.co](mailto:privacy@fundapps.co) if you want further information on the specific mechanisms used by us when transferring your personal information out of your home jurisdiction.

### 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

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to the 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. We also retain information for that period in the event that a suitable job opportunity arises that we may wish to consider you for with your consent.

After this period, we will securely destroy your personal information in accordance with our data retention policy.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### Rights of access, correction, erasure, and restriction

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 (see below).

- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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 information, or request that we transfer a copy of your personal information to another party, please contact [privacy@fundapps.co](mailto:privacy@fundapps.co).

### **Right to withdraw consent**

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our Legal Counsel at [privacy@fundapps.co](mailto:privacy@fundapps.co).

Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal information securely.

### **Privacy contact**

We have a Legal Counsel who oversees compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact [privacy@fundapps.co](mailto:privacy@fundapps.co). You have the right to make a complaint at any time to the relevant regulator in your home jurisdiction with respect to data protection issues.