



## Job Application Privacy Notice

The Company is aware of its obligations under the General Data Protection Regulation (“GDPR”) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we collect and hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

### Who are we?

Ravenscroft is an independently owned investment services group with offices in Guernsey, Jersey, London, Monaco and Peterborough.

Today we employ more than 100 people and have nearly £6.5bn of assets under administration for both private and institutional clients.

It is our aim to build the leading Channel Islands-based investment services firm through exceptional customer service, integrity and accountability.

Ravenscroft Holdings Limited is listed on The International Stock Exchange and is a member of The International Stock Exchange. Ravenscroft Limited and Ravenscroft Investment Management Limited are licensed and regulated by the Guernsey Financial Services Commission. Ravenscroft Limited is also regulated by the Jersey Financial Services Commission and is a member of both The London Stock Exchange and The International Stock Exchange.

We provide traditional execution only and advisory stockbroking, segregated and pooled investment management, market making and corporate finance services and the dealing and storage of gold, silver, platinum and palladium via Ravenscroft Precious Metals Limited (trading as Bullion Rock) to our private and institutional clients in the Channel Islands and beyond.

We create value for our clients and stakeholders through a business model that promotes our key value drivers; the personal relationships we develop with our clients, our proprietary investment processes, and our skilled employee base.

## Data Controller

Ravenscroft Limited (“Ravenscroft”) or (“the Company”) will act as the data controller, meaning that it determines the processes to be used when using your personal data. Its registered office address and contact details are as follows:-

Ravenscroft Limited  
PO Box 222  
The Market Buildings  
Fountain Street  
St Peter Port  
Guernsey  
GY1 4JG

Telephone: 01481 729100  
Website: [www.ravenscroftgroup.com](http://www.ravenscroftgroup.com)  
Email: [dataprotection@ravenscroftgroup.com](mailto:dataprotection@ravenscroftgroup.com)

## Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way;
- collect your data only for reasons which we find appropriate during the course of your application in ways that have been explained to you;
- only use it in the ways that we have told you about;
- if relevant, ensure it is correct and up to date;
- keep your data for only as long as we might need it; and
- process it in a way that ensures it will not be used for anything of which you are not aware or to which you have not consented.

## Types of data we process

We may hold many types of data about you as provided for the purpose of your application which may include, but is not limited to, the following:

- your personal details including your name, address, date of birth, email address, phone numbers;
- gender;
- marital status;
- whether or not you have a disability;
- information included on your CV including references, education history and employment history;
- documentation relating to your right to work in Guernsey or Jersey;
- pre-employment documentation – social security details, tax, passport and driving licence; and
- personality profile data through Insights Discovery.

In certain instances, personal data may include “Special Category Data” which includes information such as a person’s:

- health data; and

- criminal record or alleged criminal activity.

### How we collect your data

We collect data about you in a variety of ways including the information you would normally include in a CV or a job application cover letter, or notes made by our recruiting officers during a recruitment interview. Further information will be collected directly from you when you complete forms at the start of your employment; for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving licence, passport or other right to work evidence.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references, credit reference agencies and through any Accuity checks.

Personal data is kept in personnel files or within the Company's Human Resources ("HR") and Information Technology ("IT") systems.

### Why we process your data

The law on data protection allows us to process your data for certain reasons only, as follows:-

- in order to perform the employment contract to which we are party;
- in order to carry out legally required duties;
- in order for us to carry out our legitimate interests;
- to protect your interests; and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons above. Generally, we will rely on the first three reasons set out above to process your data.

We need to collect your data to ensure we are complying with legal requirements such as:

- carrying out checks in relation to your right to work in Guernsey or Jersey; and
- making reasonable adjustments for disabled employees.

We also collect data so that we can carry out activities which are in the legitimate interests of the Company. We have set these out below:-

- making decisions about suitability for employment;
- making decisions about salary and other benefits;
- assessing training needs; and
- dealing with any legal claims which may be made against us.

If you are unsuccessful in obtaining employment, your data will not be used for any reason other than in the ways explained in relation to the specific application you have made.

In some cases we might seek your consent to retaining your data in case other suitable job vacancies arise in the Company for which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

### **Criminal conviction data**

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law so permits. This data will usually be collected at the recruitment stage: however it may also be collected during your employment should you be successful in your application.

### **If you do not provide your data to us**

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with (as appropriate), your application if you do not.

### **Sharing your data**

Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties with regard to recruitment. This includes, for example, the HR department, those in the department where the vacancy is who are responsible for screening your application and interviewing you, the IT department where you may require access to the Company's systems to undertake any assessments requiring IT equipment.

In some cases, we will collect data about you from third parties such as employment agencies. Your data will be shared with third parties if you are successful in your job application. In these circumstances, we will share your data in order to obtain pre-employment requirements, payroll requirements and benefit set up.

### **Protecting your data**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such occurrences.

Any CVs, notes or personal information received as part of an application for a vacancy is sent to HR for processing and is stored within a secure file on the HR drive or held in a locked filing cabinet to which HR holds the key. When information is passed on internally, we will ensure that it is only done so within the necessary scope of the application. Any information from an applicant that is distributed internally will be collected and destroyed by HR as soon as the information is no longer required.

Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

### How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will only keep your data until the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for six months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate GDPR policy for employees, which will be provided to you in your contract of employment and may also be found in the staff handbook.

### Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:-

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice;
- the right of access. You have the right to access the data that we hold on you and to do so, you should make a subject access request to [dataprotection@ravenscroftgroup.com](mailto:dataprotection@ravenscroftgroup.com);
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it;
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it;
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct;
- the right to portability. You may transfer the data that we hold on you for your own purposes; and
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent apart from us not being able to process your data in relation to employment decisions.

However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact our data protection officer.

### **Data Protection Officer**

The Company's Data Protection Officer can be contacted via [dataprotection@ravenscroftgroup.com](mailto:dataprotection@ravenscroftgroup.com) or by telephoning 01481 729100.

### **Review**

We keep this Privacy Notice under review.  
We last updated this document on 18 January 2019.

### **Making a complaint**

The supervisory authorities in Jersey and Guernsey for data protection matters are listed below. If you think your data protection rights have been breached in any way by us, you are able to make a complaint directly to them.

#### **Guernsey**

Office of the Data Protection Commissioner  
Guernsey Information Centre,  
North Esplanade, St Peter Port,  
Guernsey. GY1 2LQ

Telephone 01481 742074  
Email [enquiries@dataci.org](mailto:enquiries@dataci.org)

#### **Jersey**

Office of the Information Commissioner  
Brunel House, Old Street, St Helier,  
Jersey. JE2 3RG

Telephone 01534 716530  
Email [enquiries@oicjersey.org](mailto:enquiries@oicjersey.org)