

## Raymond James Job Candidate Privacy Notice

### Introduction

Raymond James Investment Services Limited (Reg. No. 03779657) and Raymond James Financial International Limited (Reg. No. 03127076) whose registered office is at Ropemaker Place, 25 Ropemaker Street, London, England EC2Y 9LY ("Raymond James" or "we" or "our") is committed to respecting the privacy of individuals.

Raymond James Investment Services Limited and Raymond James Financial International Limited are separate "data controllers". This means that each entity is individually responsible for deciding how it will process your personal data.

This Privacy Notice ("**Notice**") and any other documents referred to in it, set out the basis on which we process personal data, why we collect, store, use and share personal data, your rights in relation to your personal data. For the purposes of applicable data protection laws (in particular, the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the "**GDPR**")), generally, the party who you deal with is the data controller.

The Data Protection Officer for Raymond James Investment Services Limited is Rob Patchett (Global Chief Privacy Officer and I.T Chief Compliance Officer). You may contact Rob Patchett sending an email to RJEUPrivacy@raymondjames.com.

### Personal Data We Collect

We may collect and process the following personal data:

#### Information you give us:

As part of any recruitment process, Raymond James collects and processes personal data relating to job applicants. Raymond James is committed to being transparent about how it collects and uses that data, and to meeting its data protection obligations.

We may collect and process personal data relating to your applications for employment or an independent contract, this may include any of the following personal data: your name, contact details including email address and telephone number; details of your qualifications, skills, experience and employment history; information about your pay and benefits; whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; information about your criminal record; information about your entitlement to work in the UK; and any specialisms.

Raymond James collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport and other identity documents, via third parties such as recruitment agencies or collected through interviews or other forms of assessments, including online testing.

This personal data will be stored in a range of different places, including in your application record contained in an on-line applicant tracking system, in HR management systems, line manager filing systems, and on other IT systems (including email).

This list is not exhaustive.

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## Information we collect about you

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- if you visit one of our Branches, we may collect your physical image through our use of CCTV cameras;
- if you visit our website, we may collect your IP address and/or use cookies to gather further information about your use of our site. Further information about our use of Cookies is contained in our [Cookies Policy](#);
- information about your visit to our website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page; and
- telephone call information, as it is standard practice at Raymond James, that we will record all external calls for training, compliance, security and evidentiary purposes even where these calls fall outside of our regulatory obligations.

This list is not exhaustive.

## Information we receive from other sources:

Raymond James may also collect personal data about you from third parties, such as from recruitment agencies references supplied by former employers, and information from criminal records checks. Raymond James may seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

At present Raymond James does not undertake any automated decision making processes which could result in a negative consequence.

This list is not exhaustive.

## Information about other people

If you provide information to us about any person other than yourself, such as candidates, your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

This list is not exhaustive.

## Special Category Personal Data:

In certain limited cases, we may collect certain special category personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, subject to the above, we will only do so on the basis of your explicit consent.

## How We Use Personal Data?

Raymond James needs to process your data to take the necessary steps prior to entering into a contract with

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you. It also needs to process your data to enter into a contract with you.

## **Consent:**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. Where Raymond James seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment. Please see section “What If You Do Not Provide Personal Data?”

In limited circumstances, we may approach you for your written consent to allow us to process particularly sensitive data. Where we do so, we will provide you with details of the information we would like and our reasoning behind asking for it, so that you can carefully consider whether you wish to provide consent.

For example

- health information is required make reasonable adjustments in line with equality legislation; and
- other special categories of personal data, such as information about ethnic origin, sexual orientation, age range, health or religion or belief, may be processed for the purposes of equal opportunities and diversity monitoring.

Where Raymond James processes other special categories of personal data, such as information about ethnic origin, sexual orientation, age range, health or religion or belief, this is done for the purposes of equal opportunities and diversity monitoring.

For some roles, Raymond James may be obliged to seek information about criminal convictions and offences, and may include undertaking a Disclosure and Barring Service check.

You have the right to withdraw your consent at any time by either contacting us using the contact information provided below.

It is up to you whether you provide information when requested. However, please note that if you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of the right to work in the United Kingdom, qualifications or employment history), we will not be able to continue with your application.

This list is not exhaustive.

## **Contract performance**

We may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide products and/or services to you or in relation provide products and/or services you provide to us; to communicate with you in relation to the provision of the contracted products and services; to provide you with administrative support such as account creation, security, and responding to issues; and provide you with industry information, surveys, information about events, offers and promotions, related to the products and/or services.

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## **Legitimate interests**

Where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are processing personal data:

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- during the recruitment process and for keeping records of the process
- from job applicants to allow us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job; and
- to respond to, and defend against, legal claims.

You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading "Your rights".

This list is not exhaustive.

#### **Where required by law:**

We may also process your personal data if required by law, including registering your details with relevant regulatory bodies, governmental or quasi-governmental bodies; responding to requests by regulatory bodies, government or law enforcement authorities, or for the prevention of crime or fraud. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

This list is not exhaustive.

#### **With Whom Do We Share Personal Data?**

We may share your information across our group entities (including, for example, where your hiring manager is based outside of the UK).

Your information will be shared internally for the purposes of the recruitment exercise. We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it, including members of the HR team and interviewers involved in the recruitment process.

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

Raymond James may share your data with third parties to run the recruitment process (for example psychometric testing and background checks). We may also need to share personal data collected during the recruitment process with IT and HR systems providers and recruitment agencies.

Raymond James may share your data with third parties that process data on its behalf, including (but not limited to):

- Recruitment agencies;
- Services providers such as third parties who candidate assessment process such as psychometric testing; reference/background checking, payroll services and IT/HR consultancy services providers;
- Former employers and the Disclosure and Barring Service;
- HR and IT systems providers;
- Training Providers for our apprenticeship programme;
- Regulators; and
- Legal and other professional advisers.

We will ensure there is a contract in place with the categories of third parties listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

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Where a third party recipient is located outside the UK, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the Information Commissioner's Office/European Commission (as appropriate) where the data protection authority does not believe that the third country has adequate data protection laws.

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We will share personal data if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and other agreements; or if we reasonably consider this necessary; or to protect the rights, property of others. We will share personal data with law enforcement or other authorities if required by applicable law.

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

## **How Long Will We Keep Personal Data?**

We will retain your personal data for as long as we believe it necessary or desirable to fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests or orders from competent courts.

If your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. If requested, and you consent to us keeping your personal data on file, this will be retained for 2 years for consideration for future employment opportunities. At the end of that period (or once you withdraw your consent), your data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The period for which your data will be held will be provided to you in the Raymond James Employee Privacy Notice.

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It will then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice though it may also be used in other ways not described here.

## **Where Do We Store Personal Data And How Is It Protected?**

We take reasonable steps to protect your personal data from loss or destruction.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to

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our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## Automated Decision Making

Employment decisions are not based solely on automated decision-making.

## Your Rights

Under the GDPR, you have various rights with respect to our use of your personal data:

### Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information or if your request is manifestly unfounded or excessive.

### Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

### Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

### Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

### Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

### Right to data portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

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Please note that there are exceptions to these rights, if, for example, we are under a legal obligation to continue to process your personal data. If we are unable to comply with your request due to an exception we will explain this to you in our response.

If you wish to exercise any of these rights please contact [RJEUPrivacy@raymondjames.com](mailto:RJEUPrivacy@raymondjames.com)

## Contact

If you would like to contact us about this Notice, our use of your personal data, or about exercising any of your rights, please contact us by email at [RJEUPrivacy@raymondjames.com](mailto:RJEUPrivacy@raymondjames.com) or by writing to us at: Privacy Department, Raymond James, Ropemaker Place, 25 Ropemaker Street, London EC2Y 9LY

## Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

## Changes to our Notice

Any changes we may make to our Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Privacy Notice.

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