



PUMA INVESTMENTS
Calculated Excellence

CANDIDATE PRIVACY STATEMENT

Introduction

Puma Investment Management Limited, a subsidiary of Shore Capital, is committed to protecting the privacy and security of personal information collected, held and processed about candidates during the recruitment process.

This candidate privacy statement provides information on how your personal data is collected, why we need it and how we will use and store it in order to manage your application during the recruitment process. Please take the time to read and understand this document.

This statement will be kept under regular review and therefore, may be updated from time to time. The latest copy will be made available on our website.

About this privacy statement

This policy applies to the EEA operating subsidiaries of Shore Capital Group Limited (“SCGL”) including but not limited to: Shore Capital Stockbrokers Limited (“SCS”), Shore Capital and Corporate Limited (“SCC”), Puma Investment Management Limited (“PIML”) and Shore Capital Limited (“SCL”) operating in the UK and each of which are authorised and regulated by the Financial Conduct Authority; each one a “Company”, together the “Companies”. They shall collectively be referred to as ‘Shore Capital’ and for simplicity; “we”, “us” and “our” will mean ‘Shore Capital’ throughout this statement.

We are registered in the UK and our registered address is at Bond Street House, 14 Clifford Street, London W1S 4JU. For the purposes of data protection law, we are a data controller in respect of your personal data and we are responsible for ensuring that your personal data is used in compliance with data protection law.

Personal data that we collect about you

In order to manage your application, we need to collect and process the following personal data about you:

- Information that you provide to us or that may be provided to us by one of our affiliates or third parties on your behalf. This includes information about you that you give to us through the recruitment process. This information may include:
 - your full name, nationality and passport details, education and qualification details, CV/employment history, academic and professional qualifications or skills, home address and telephone number, mobile telephone number, email address, photographs or images from recorded assessments, referee details, compensation information and other information necessary to evaluate a candidate’s suitability for employment or as required by law or for regulatory reasons.

Candidates are responsible for the content of the information they provide to us and you must ensure it is truthful, accurate and not misleading in any way. You must understand that, in the event that your application is successful, you may be subject to disciplinary action and possible dismissal if the statements contained in your application form and/or supporting documents prove to be untrue.

- Information we collect or generate about you. This includes:



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- o psychometric test results, interview notes/feedback, outcomes of any behavioural or other recruitment related tests or assessments, references and the results of any pre-employment checks, including criminal records checks, credit and fraud checks.

During the recruitment process we may also capture some sensitive personal data about you (e.g. disability information). We do this in order to make reasonable adjustments to our recruitment processes to ensure candidates invited to interview can fully participate throughout the recruitment process.

Personal data about other individuals

If a candidate provides us with personal data about other individuals (e.g. individuals listed by candidates as referees), it is the candidate's responsibility to inform such individuals of such disclosures and to obtain their explicit consent to the processing (including transfer) of that personal data as set out in this statement.

Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- to consider your suitability for the vacancy you have applied for;
- to make reasonable adjustments for disability during the recruitment process;
- to meet our legal or regulatory obligations as a prospective employer;
- to meet our statutory obligations in relation to equality and diversity monitoring.

We are entitled to use your personal data in these ways because:

- we need to in order to prepare for entering into a contract with you, in particular to consider you for a position with us;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your personal data as described may be necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as allowing us:
 - o to effectively and efficiently assess your skills, qualifications and suitability for the vacancy you are applying for;
 - o to effectively verify the information you have provided to us during the recruitment process;



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- o to effectively and efficiently administer and manage the operation of our business;
- o to ensure consistency in our approach to recruitment across our business; or
- o to be able to contact you in relation to your application during the recruitment process.

How your personal data is shared

Your personal information may be shared internally with the following people:

- managers involved in the recruitment process, who may or may not have direct managerial responsibility for you or other employees acting on their behalf;
- members of senior management who have responsibility for authorising the recruitment of new hires into the business;
- security, reception or facilities staff that have responsibility for ensuring the security and safety of our premises; and
- access may also be granted, on a strict need to know basis, to others where permitted by law.

Personal data may also be shared internally between our employees in particular departments (such as HR, Legal or Compliance) who legitimately need the information in order to perform their duties in relation to the recruitment process. The amount of personal information that is shared within the business will be limited in accordance with the department's operational needs in relation to the recruitment process.

We may also need to disclose certain personal data to certain external third parties for the purposes of:

- verifying your employment history, qualifications and/or references with third parties named on your CV or provided by you during the recruitment process;
- arranging for you to complete technical or psychometric tests as part of the recruitment process with third party suppliers, who provide assessment or recruitment services on our behalf; or
- to protect the legitimate interests of our business (unless this would prejudice the rights and freedoms or interests of the candidate), or where it is in our judgement to comply with applicable legal or regulatory obligations and regulatory inquiries or requests.

We require all third parties to ensure the security of your personal data and to treat it in accordance with the GDPR. Consequently, they may only use your personal data for the purposes we specify in our contract with them.

Security of personal data

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your personal information. We take appropriate organisational and technical security measures and have controls, rules and procedures in place to ensure that any personal information we hold on our computer systems is not accessed by anyone it shouldn't be.



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Retention and disposal of personal data

How long we hold your personal data for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your personal data – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

If we have received your personal data for a vacancy and, you are unsuccessful at any stage of the process, your information will be held for 24 months after the date of your application. However, if you are successful, your personal data will form part of your employment record with us for the duration of your employment plus 6 years following the end of your employment.

When your personal data is no longer needed it will be disposed of securely in a way that protects your privacy and ensures the permanent and safe deletion of the data (e.g. shredding, disposal as confidential waste, or secure electronic deletion).

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and/or to refuse that request;



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- The right to access personal data held by us about you. If you wish to make such a request, please contact the HR team; and
- The right to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by us.

Any questions

If you wish to exercise these rights or you have any queries about your personal data, please contact the HR team at hr@shorecap.co.uk. You can also find out more information about your rights by contacting the data protection regulator in your jurisdiction.

This privacy statement was last updated May 2018.