



B O W M O R E
A S S E T M A N A G E M E N T

JOB APPLICANT PRIVACY NOTICE
2020

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Introduction

During the recruitment process, Bowmore Asset Management (the Company) collects and processes personal data relating to job applicants. The Company is committed to being clear and transparent about how it collects and uses that data and to meeting its data protection obligations.

The data controller is Bowmore Asset Management of One Heddon Street, Mayfair, London, W1B 4BD (“we”, “us” or “our”). Details of our notification to the data protection regulator may be found in the Information Commissioner’s Office Public Register of Data Controllers at ico.org.uk.

What information does the Company collect and process?

The Company collects and processes a range of personal information (personal data) about you. Personal data means any information about an individual from which the person can be identified. This includes:

- personal contact details, such as your name, title, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers;
- information about your remuneration, including entitlement to benefits such as pensions;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The Company collects this information in a variety of ways during the application and recruitment process. For example, data may be contained in application forms and CVs, obtained from identity documents, such as your passport and collected through interviews and assessment tests.

The Company may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers such as credit checks, and information from criminal records checks permitted by law.

Data is stored in a range of different places, including software provided to us by the third party on line recruitment systems upon which you may apply; on your application record; in the Company's HR management systems; in and in other IT systems including the Company's email system.

Why does the Company process personal data?

The Company needs to process data prior to entering into a contract with you. We also need to process data to enter into an employment contract with you and to meet our obligations under that employment contract.

In addition, the Company needs to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the UK before employment begins.

During the recruitment process the Company has a legitimate interest in processing personal data and in keeping records of that process. Processing such data from job applicants enables the Company to manage the recruitment process, assess the suitability of candidates and make informed decision as to whom we wish to recruit. The Company may also have to process data from job applicants in order to defend legal claims.



The Company processes health information if we need to make reasonable adjustments to the recruitment process for candidates with a disability.

For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake a particular role.

If you fail to provide personal information

You are under no obligation to provide the Company with data during the recruitment process. However, if you do not provide certain information when requested, the Company may not be able to process your application for employment properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for you if this information is not provided.

Automated decision-making

Our employment decisions are not based solely on automated decision-making.

For how long do you keep data?

The Company will only hold your personal data for as long as is necessary to fulfil the purposes for which we collected it. If your application for employment is unsuccessful, the Company will hold your data on file for one year after the end of the recruitment process. At the end of that period, your data is 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 we shall issue a new privacy notice which sets down the periods for which your data will be held.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment process, including with the Recruiting Manager; the Executive Directors and our HR Consultants carrying out work on our behalf.

The Company will not share your data with third parties unless we make you an offer of employment. In those circumstances, the Company shall share your data with third parties where required by law and where it is necessary in order to administer the working relationship with you or where we have another legitimate interest in doing so. The Company will then share your data with:

- our professional advisers, such as our HR Consultant; Accountants and legal advisers, where they require that information in order to provide advice to the Company;
- HM Revenue & Customs and any other regulatory authority we may be subject to for the purpose of demonstrating compliance with applicable law and regulations;
- such third parties as we reasonably consider necessary in order to prevent crime, such as the police;
- our service providers such as our pensions and benefits providers and payroll administrators, as well as those who provide and support our management and data storage systems.

The Company will not transfer your data to countries outside the European Economic Area.

How does the Company protect data?

The Company takes the security of your data seriously. The Company has internal controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.



Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request (known as a “data subject access request”);
- require the Company to change incorrect or incomplete data;
- request erasure of your personal information. This enables you to ask the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to suspend the processing of your personal data for a period of time if data is inaccurate or there is a dispute about its accuracy or the reason for processing it.

If you would like to exercise any of these rights, or you have any questions about the privacy notice, please contact James Keen, who is the person responsible for Data Protection within the firm. You may contact him at One Heddon Street, Mayfair, London, W1B 4BD. Telephone 020 3617 9206. Email: enquiries@bowmoream.com

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner’s Office. You may do this online at <https://ico.org.uk/concerns/handling/y> or in writing to Information Commissioner's Office, Wycliffe House’ Water Lane’ Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113.

