

## **CANDIDATE PRIVACY NOTICE**

### **INTRODUCTION**

QBE Management Services (UK) Limited and QBE Europe SA/NV (the “Companies”) are committed to protecting the personal information of their job applicants. This Notice sets out important information about how the Companies and their subsidiaries, affiliates, and related entities (“**QBE**” or “**we**” or “**us**”) collect, use, share and store your personal information (also known as “personal data”) during the application and recruitment process.

You should read this Notice carefully and raise any questions you may have with the Talent Acquisition Team or the Data Protection Officer. Their contact details are provided below.

We may update this Notice at any time.

This Notice was last updated on 14/12/2022.

### **SCOPE**

This Notice applies to job applicants located in the UK. In connection with the recruitment process, the relevant data controller for these purposes is QBE Management Services (UK) Limited, (registered at 30 Fenchurch Street, London, EC3M 3BD), and in some cases also QBE Europe SA/NV (registered at Boulevard du Régent 37, 1000 Brussels, Belgium) or QBE Europe SA/NV’s UK branch office (also at 30 Fenchurch Street), as specified in the application and recruitment process. We are responsible for all personal information, whether directly provided by you or via a third party, under our possession, control and custody for processing.

QBE has drafted this Notice and appointed a Data Protection Officer to ensure our compliance with relevant regulations, including the EU GDPR, the UK GDPR and the UK Data Protection Act 2018.

### **WHAT PERSONAL INFORMATION DO WE COLLECT?**

Personal information means information which identifies you and relates to you as an individual. As your prospective employer, QBE will collect, use, share and store your personal information for a wide variety of reasons in connection with the application and recruitment process. We have set out below the main categories of candidate personal information which we will process in connection with our recruiting activities on a regular basis:

- personal contact information (including your name, home address (including appropriate proof of address), personal telephone number(s) and personal e-mail address)\*
- work history and other relevant experience including information contained in CV, cover letter or job application form\*
- education information including degrees awarded, transcripts and other information provided in support of the job application\*
- compensation history
- passport
- driving licence
- information collected during phone screenings and interviews\*
- details regarding the type of employment sought, desired salary, willingness to relocate, job preferences, and other information related to compensation and benefits\*
- reference information and information received from background checks (where applicable) including information provided by third parties\*
- information related to previous applications to us or previous employment history with us
- documents evidencing your right to work (including information about your immigration status where relevant) \*
- date of birth

- gender
- marital status
- information gathered through QBE's monitoring of its IT systems, building access records and CCTV recording in relation to your communications with us and attendance at our premises\*

The personal information that has been or is to be provided by you and identified with an asterisk (\*) above is mandatory in connection with our recruiting activities and/or to enable us to comply with statutory requirements relating to immigration or taxation. Failure to provide mandatory personal information may affect our ability to accomplish the purposes stated in this Notice, including considering your suitability for employment and/or entering into an employment contract with you.

The list set out above is not exhaustive, and there may be other personal information which QBE collects, stores, shares and uses in the context of the application and recruitment process. QBE will update this Notice from time to time to reflect any notable changes in the categories of personal information which it processes.

The majority of the personal information which we process will be collected directly from you. However, your personal information may also be provided to us by third parties, such as recruitment agencies, former employers, official bodies (such as regulators), medical professionals, **credit reference and/or criminal record agencies**. The amount of information that is obtained from some of these third parties, will depend on the seniority of your role when you join QBE.

#### **REFERENCING AND VETTING**

If you are successful in your application and accept a conditional offer of employment with us, as part of our referencing and vetting procedures, we may contact or use certain third parties, in order to verify your personal information (including personal information that you provide as part of the application and recruitment process) or carry out appropriate pre-employment checks. These third parties may include:

- former employers, in order to verify your previous employment history
- universities and/or other educational establishments, in order to verify your education history
- professional bodies, to verify your professional memberships and/or qualifications
- credit reference or criminal record agencies

In some instances, you will be requested to provide information to these third parties to allow appropriate checks to be carried out. If we intend to contact a third party about you, we will inform you in advance of doing so.

#### **WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?**

QBE uses your personal information for a variety of purposes in order to take steps necessary to enter into an employment contract with you, to comply with legal obligations or otherwise in pursuit of its legitimate business interests. We have set out below the main purposes for which candidate personal information is processed:

- to identify and evaluate job applicants, including assessing skills, qualifications and experience
- to verify candidate information and carry out employment, background and reference checks, where applicable, and in order to prevent fraud
- to communicate with you about the recruitment process and your application
- to comply with our legal, regulatory, or other corporate governance requirements
- to conduct data analytics to review and better understand the operation of our recruitment processes
- to maintain our internal integrity, access control, and security of our office buildings and websites

Again, this list is not exhaustive, and QBE may undertake additional processing of personal information in line with the purposes set out above. QBE will update this notice from time to time to reflect any notable changes in the purposes for which it processes your personal information.

In addition to using your personal information to consider you for the role you applied for, if you are unsuccessful, we will retain and process your personal information to inform you about and to consider you for other roles that may be appropriate for you. If you do not want us to consider you for other roles which we consider may be appropriate for you, please inform your recruitment contact.

## **LEGAL BASIS FOR PROCESSING YOUR DATA**

Your personal information is collected and processed for various business purposes, in accordance with applicable laws.

We will only collect, use and share your personal information where we are satisfied that one or more of the following legal bases apply:

- The processing is necessary for compliance with a legal obligation to which QBE is subject, for example, disclosing information to local tax authorities, making statutory payments, avoiding unlawful termination, avoiding unlawful discrimination, meeting statutory record keeping requirements or health and safety obligations
- The processing is necessary for the performance of a contract to which you are a party or in order to take steps, at your request, prior to entering into such a contract, for example collecting bank details to pay your salary or processing information to provide you with the contractual benefits to which you are entitled
- The processing is based on your consent. Where consent is required for the processing in question, it will be sought from you separately to ensure that it is freely given, informed and explicit. Information regarding such processing will be provided to you at the time that consent is requested, along with the impact of not providing any such consent. You should be aware that it is not a condition or requirement of your employment to agree to any request for consent from QBE
- The processing is necessary for the legitimate interests pursued by QBE or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal information. QBE considers that it has a legitimate interest in processing personal information for the purposes set out above, and to support the achievement of its immediate and long-term business goals and outcomes

The legitimate business interests that QBE may rely on to process your personal information include the following:

- Network and Information Security – QBE monitors access to accounts containing personal information about you to prevent theft of data and to ensure the security of our systems.
- Employee Relations – to manage disciplinary and grievance processes, flexible working arrangements, and/or other employee/worker related issues.
- HR Records – QBE keeps records in order to manage the employment relationship and to maintain appropriate documentation.
- Background Checks – QBE processes your personal information to undertake background vetting of employees. This will include asking for references from previous employers. No sensitive personal/special category information will be requested or used as part of this process (but also see below on criminal records checks, which contain sensitive personal information).

## **WHAT SENSITIVE PERSONAL/SPECIAL CATEGORY PERSONAL INFORMATION DO WE COLLECT?**

Certain categories of information are considered "sensitive personal/special category personal information" and are subject to additional safeguards. QBE limits the sensitive personal/special category personal information which it processes as follows:

- **Health Information**

QBE may process information about your physical or mental health in order to make reasonable adjustments to the recruitment process.

If you are successful and accept a conditional offer of employment with us, you may be assessed for fitness for the role. Information concerning your health will only be shared with us by any occupational healthcare provider with your consent.

We will always treat information about health as confidential and it will only be shared internally where there is a specific and legitimate purpose to do so. We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal information against accidental loss and unauthorised access, use, alteration, or disclosure.

If you are successful, any health information processed as part of the recruitment process that is relevant to QBE's compliance with its obligations in connection with employment will be retained and processed in accordance with the Employee Privacy Notice.

- **Criminal Record and Credit Reference Information**

Given the nature of our business and as part of our background vetting process and in compliance with our obligations in connection with employment, we may request standard or basic criminal record checks and credit reference checks about you where you have been successful and have accepted a conditional offer. This will depend upon the nature and seniority of the role. Details of the required checks can be provided on request. In all cases, we carry out the checks in accordance with the applicable law.

In circumstances where such a criminal record or credit check is deemed appropriate, you will be asked to provide all necessary information to Experian Limited who will carry out checks on our behalf.

We will always treat criminal record or credit reference history as confidential, and it will only be shared internally where there is a specific and legitimate purpose to do so.

- **Equal Opportunities and Diversity Monitoring**

If you voluntarily provide information about your gender, ethnicity, race, disability status it will be used by QBE for the promotion of equality purposes as described in the Voluntary Disclosure form. The data you provide allows us to ensure that we're attracting diverse talent that is representative of the communities we operate in, identify overarching trends, make improvements, and ensure we are building a more resilient future. There are appropriate contractual and security measures in place to ensure the data is appropriately safeguarded and not misused.

## **WHEN DO WE SHARE YOUR PERSONAL INFORMATION?**

QBE will share your personal information with other parties only in limited circumstances and where this is necessary to enter into the employment contract or to comply with a legal obligation, or otherwise in pursuit of our legitimate business interests. Third party recipients include the following categories, where relevant:

- recruitment agencies in connection with an executive or tailored recruitment search
- background vetting specialists

- occupational health providers
- regulators, such as:
  - the Financial Conduct Authority and/or the Prudential Regulatory Authority, the National Bank of Belgium, the Australian Prudential Regulatory Authority and/or any other applicable regulatory body
- HMRC and/or any other applicable government body

The list set out above is not exhaustive. With the exception of regulators or other government bodies, your personal information is shared under the terms of a written agreement between QBE and the third party which includes appropriate security measures to protect the personal information in line with this Notice and our obligations. The third parties are permitted to use the personal information only for the purposes which we have identified, and not for their own purposes, and they are not permitted to further share the information without our express permission.

As a global employer, QBE may also share your personal information with other group companies from time to time; for example, where you are applying for a group role.

In all cases, where personal information is transferred to a country which is deemed not to have the same level of protection for personal information as the UK, QBE has put in place written data transfer agreements and appropriate security and operational safeguards to protect the personal information. In the case of any transfer of personal information from the UK and/or from the European Economic Area (EEA) to a country outside of the UK and/or the EEA, these transfer agreements incorporate the standard contractual clauses approved by the European Commission. If you have any questions about the transfer of your personal information in these circumstances, please contact the Data Protection Officer using the details set out below.

#### **HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?**

QBE's policy is to retain personal information only for as long as needed to fulfil the purpose(s) for which it was collected, or otherwise as required under applicable laws and regulations. In certain circumstances we may anonymise your personal information so that it can no longer be associated with you. We reserve the right to retain and use such anonymous information for any legitimate business purpose without further notice to you.

For unsuccessful candidates:

- We will retain CVs and contact information collected during the recruitment process for a period of 24 months in order to follow up with you in relation to future vacancies. If you do not wish for your personal information to be maintained on file for this purpose, please inform us, in which case we will retain your information for a maximum period of 12 months from the end of the recruitment process.
- We will retain all other personal information collected during the recruitment process for a maximum period of 12 months from the end of the process, subject to any exceptional circumstances and/or to comply with particular laws or regulations.

If you are offered and accept employment with QBE, the personal information we collect during the application and recruitment process will become part of your employment record and we may use it in connection with your employment in accordance with the Employee Privacy Notice.

#### **WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION?**

QBE will always seek to process your personal information in accordance with applicable regulations, our obligations and your rights.

Under data protection laws, you have a number of rights in relation to the personal information that QBE holds about you. You can exercise your rights by contacting the Data Protection Officer at any time using the details provided below.

You have a separate right of access to your personal information processed by QBE. You may be asked for information to confirm your identity and/or to assist QBE to locate the information you are seeking as part of QBE's response to your request.

You will not be subject to decisions based solely on automated data processing without your prior consent.

In certain circumstances, you have the right to seek the erasure or correction of your personal information to ensure it is accurate, complete and up to date, to object to particular aspects of how your information is processed, and otherwise to seek the restriction of the processing of your personal information. However, whilst we will assess every request, there may be other factors which need to be taken into consideration. For example, we may be unable to erase your personal information because we have a legal or regulatory obligation to keep it. Complying with a request may also mean that we might not be able to provide certain services or benefits. We will advise you of this following your request. You also have the right to request the transfer of your personal information to another party in a commonly used format. If you have any questions about these rights, please contact the Data Protection Officer using the details set out below.

Finally, if we are unable to deal with any issue you have regarding the use of your personal information and you believe we have breached data protection laws when using your personal information, you have the right to complain to the Information Commissioner's Office (ICO). You can visit ICO's website at: <https://ico.org.uk/> for more information or contact them on 0303 123 1113. . Please note that lodging a complaint will not affect any other legal rights or remedies that you have.

#### **WHERE CAN YOU GET FURTHER INFORMATION?**

QBE has appointed a Data Protection Officer to oversee compliance with this Notice and to deal with any questions or concerns you may have. If you would like further information about the matters set out in this Notice, please contact the Data Protection Officer and/or the Talent Acquisition Team.

The contact details for the Data Protection Officer are:

**DPO, QBE Management Services (UK) Limited, 30 Fenchurch Street, London, EC3M 3BD or [dpo@uk.qbe.com](mailto:dpo@uk.qbe.com).**

The contact details for the Talent Acquisition Team are:

[qberecruitmentteam@uk.qbe.com](mailto:qberecruitmentteam@uk.qbe.com)