

## **CANDIDATE PRIVACY NOTICE**

### **INTRODUCTION**

The Company is committed to protecting the personal data of its job applicants. This Notice sets out important information about how the Company and its subsidiaries, affiliates, and related entities ("QBE" or "we" or "us") collect and use your personal data during the application and recruitment process.

You should read this Notice carefully and raise any questions you may have with HR Help or the Data Protection Officer.

We may update this Notice at any time.

### **SCOPE**

This Notice applies to job applicants located in Ireland. In connection with the recruitment process, the relevant data controller for these purposes is QBE Management (Ireland) Limited, 6-10 Suffolk Street, Dublin 2.

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

Personal data means information which identifies you and relates to you as an individual. As your prospective employer, QBE will collect, use and store your personal data 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 data which we will process in connection with our recruiting activities on a day to day basis:

- personal contact information (including your name, home 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
- 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
- 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 data to be provided by you and identified with \* above is mandatory in connection with our recruiting activities. Failure to provide mandatory personal data 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 data which QBE collects, stores 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 data which it processes.

The majority of the personal data which we process will be collected directly from you. However, your personal data may also be provided to us by third parties, such as recruitment agencies, former employers, official bodies (such as regulators), medical professionals, and third parties carrying out **bankruptcy and solvency checks and/or criminal record checks**.

## **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.

## **HOW DO WE USE YOUR PERSONAL DATA?**

QBE uses your personal data 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 data is processed:

- to identify and evaluate job applicants, including assessing skills, qualifications and experience
- verifying candidate information and carrying out employment, background and reference checks, where applicable and in order to prevent fraud
- communicating with you about the recruitment process and your application
- to comply with our legal, regulatory, or other corporate governance requirements
- for the purposes of conducting data analytics to review and better understand the operation of our recruitment processes

In addition to using your personal data to consider you for the role you applied for, we will retain and process your personal data 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 HR contact.

Again, this list is not exhaustive and QBE may undertake additional processing of personal data 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 data.

## WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS?

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

- **Health Information**

QBE may process information about a candidate's physical or mental health in order to make reasonable adjustments to the recruitment process.

If a candidate is successful and accepts a conditional offer of employment with us, they may be assessed for fitness for role in certain limited circumstances. Information concerning your health will only be shared with us by occupational healthcare providers 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.

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 Bankruptcy/ Solvency Information**

Given the nature of our business, we may request criminal record checks and bankruptcy or solvency checks in relation to successful candidates who have accepted a conditional offer as part of our background vetting process and in compliance with our obligations in connection with employment. This will depend upon the nature and seniority of the role.

In circumstances where such a criminal record or bankruptcy/ solvency check is deemed appropriate, a successful candidate will be asked to provide all necessary information to a third party who will carry out checks on our behalf.

We will always treat criminal record or bankruptcy/ solvency 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**

Candidates may be asked to complete a voluntary equal opportunities monitoring questionnaire. The survey is conducted by a third party on QBE's behalf and any information provided will only be shared with QBE on an anonymous basis and is not linked to the job application. The survey includes questions about ethnicity, gender identity and sexual orientation but all questions are optional. 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 DATA?

QBE will share personal data with other parties only in limited circumstances in order to take steps necessary to enter into the employment contract or where necessary to comply with a legal obligation, or otherwise in pursuit of its legitimate business interests as follows:

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

- occupational health providers
- the Central Bank of Ireland, the UK Financial Conduct Authority, the UK Prudential Regulatory Authority, the National Bank of Belgium and/or any other applicable regulatory body
- the Revenue Commissioners, HMRC and/or any other government body
- accountants, lawyers and other professional advisers

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

As a global employer, QBE may also share employee personal data with other group companies; for example, where you are applying for a group role.

In all cases, where personal data is transferred to a country which is deemed not to have the same level of protection for personal data as Ireland, QBE has put in place written data transfer agreements to protect the personal data. In the case of any transfer of personal data from a country within the European Economic Area (EEA) to a country outside of 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 data in these circumstances, please contact the Data Protection Officer using the details set out below.

#### **FOR HOW LONG WILL MY PERSONAL DATA BE RETAINED?**

QBE's policy is to retain personal data 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. Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you.

For unsuccessful candidates:

- We will typically retain CVs and contact information collected during the recruitment process for a period of 24 months in order to follow up with the candidates in relation to future vacancies; if you do not wish for your personal data to be maintained on file for this purpose, please inform us, in which case we will retain your data for a maximum period of 12 months from the end of the recruitment process.
- We will typically retain all other personal data 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 data we collected 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 MY RIGHTS IN RELATION TO MY PERSONAL DATA?**

QBE will always seek to process your personal data in accordance with its obligations and your rights.

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data. You also have the right to request the transfer of your personal data 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.

You have a separate right of access to your personal data processed by QBE. You may be asked for information to confirm your identity and/or to assist QBE to locate the data you are seeking as part of QBE's response to your request. If you wish to exercise your right of access you should set out your request in writing to the Data Protection Officer using the details set out below.

Finally, you have the right to raise any concerns about how your personal data is being processed with the Data Protection Commissioner's Office (DPC) by going to the DPC's website: <https://www.dataprotection.ie/> or contacting the DPC on 1890 252 231 or [info@dataprotection.ie](mailto:info@dataprotection.ie).

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

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

The contact details for the Data Protection Officer are set out below:

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