

LSEG Recruitment Privacy Notice

Version 1.1 – 3 August 2020



London
Stock Exchange Group

RECRUITMENT PRIVACY NOTICE

1. INTRODUCTION

- 1.1 This Privacy Notice explains how the London Stock Exchange Group plc and the London Stock Exchange Group of companies ("LSEG" or "we", "us" or "our") collects information from you during our recruitment process.
- 1.2 We may also collect information from you when you download our products or services, attend our events or events we host, apply for a regulated role for companies listed on our markets, or visit our website. Please visit our [Privacy Policy](#) for more information. Our website uses cookies and other tracking technologies to improve and tailor your browsing experience. Please visit our [Cookies Policy](#) for more information.
- 1.3 Please read this Privacy Notice carefully and re-visit this page from time to time to review any changes that may have been made.
- 1.4 Your data controller will be the LSEG entity which collected your personal data. We will process any personal information we collect about you in accordance with applicable data protection laws, and where required, we will maintain appropriate registrations as data controllers with the local regulatory bodies.
- 1.5 Nothing in this Privacy Notice shall apply to the extent that it is incompatible with applicable data protection laws.
- 1.6 Whilst your data controller may be a specific LSEG entity, your details may be held in our contact database which can be accessed and used by other LSEG entities, which may be located outside the EEA. For more information on data sharing and transfers of data outside of the EEA, please see section 5 below.

2. WHAT PERSONAL INFORMATION DO WE COLLECT

- 2.1 "**Personal Information**" refers to information which does or is capable of identifying you as an individual. The types of Personal Information that we process may be tailored to the role we are recruiting for and your circumstances (and may also vary by country, and according to applicable law). However, the following is an overview of the types of prospective staff Personal Information which we process:
- 2.1.1 your name;
 - 2.1.2 personal contact details (including telephone number and postal address);
 - 2.1.3 age/date of birth;
 - 2.1.4 sex/gender;
 - 2.1.5 employment history;
 - 2.1.6 emergency contacts and details of any dependents;
 - 2.1.7 referee details;
 - 2.1.8 immigration status (to determine if a work permit is required);
 - 2.1.9 nationality;
 - 2.1.10 driving licence and/or passport or other identification card;
 - 2.1.11 financial information (where we necessary for financial background checks);
 - 2.1.12 national insurance number (or your local country equivalent) and other tax-related information;
 - 2.1.13 diversity information, which includes racial or ethnic origin, gender identity, sexual orientation and disability information (where appropriate, for equal opportunity monitoring in accordance with local law and as described in sections 3.4, 3.5, and 6.3 below);
 - 2.1.14 details of criminal convictions (if required for particular roles and in accordance with applicable local law); and
 - 2.1.15 additional information that you choose to tell us or that your referees may provide about you.
- 2.2 We also process Personal Information of people whose data we receive during the recruitment process such as referees and emergency contacts. We usually only require basic contact information referees



(such as name, email address and telephone number) which we will use to confirm information about prospective staff.

- 2.3 We collect Personal Information of prospective staff either directly or through other sources, such as our recruitment service providers or referees. Where Personal Information is provided to us by our recruitment service providers or other third party source, such sources will be the controllers of your data in their own right. This means they will make their own decisions about how your data is processed, and you should refer to their own privacy notices and policies in respect of how they use your Personal Information.

3. HOW WILL WE USE ANY PERSONAL INFORMATION THAT WE COLLECT?

- 3.1 The following is an overview of LSEG's recruitment purposes for processing your Personal Information. Please remember that additional information may be provided to you in a separate notice, or any specific terms and conditions we have entered into with you. In the event of any conflict between this Privacy Notice, any separate notice or any specific terms and conditions we have entered into with you, the applicable terms and conditions shall take precedence.

- 3.2 All processing of Personal Information which we undertake is justified by a "condition" for processing. In addition, processing of sensitive Personal Information is always justified by a secondary condition. In the majority of cases, processing will be justified on the basis that:

- 3.2.1 you have consented to the processing;
- 3.2.2 the processing is necessary to perform a contract or to take steps to enter into a contract;
- 3.2.3 the processing is necessary for us to comply with a relevant legal obligation; or
- 3.2.4 the processing is in our legitimate commercial interests, subject to your interests and fundamental rights.

- 3.3 The recruitment purposes for which we process your Personal Information are:

- 3.3.1 storing your details in our database, so that we can contact you;
- 3.3.2 reviewing information about you in respect of a vacancy;
- 3.3.3 carrying out and completing our recruitment process, including steps necessary to conclude a contract with you;
- 3.3.4 fulfilling obligations arising from contracts between LSEG and third parties in respect of your recruitment;
- 3.3.5 complying with our legal obligations (for example, in relation to the detection of crime or facilitating payment of tax);
- 3.3.6 verifying details you have provided using third party resources (for example, psychometric evaluations or skills tests), or to request information such as references, qualifications and criminal convictions (where we require such information in respect of certain roles and in accordance with local laws); and
- 3.3.7 if you are a referee, contacting you to obtain a reference.

Your personal data may be processed either electronically or in hard copy form, both inside and outside the EU and the EEA, in accordance with section 6.

- 3.4 Where appropriate and in accordance with local law, we collect sensitive Personal Information about your racial or ethnic origin, gender identity, disability, age and/or sexual orientation to ensure our practices align to our equal opportunities policy and fulfil applicable legal and/or regulatory reporting requirements. Where appropriate, and in accordance with local law, we use such information on an anonymised, aggregated basis to monitor and manage our compliance with our equal opportunities policy and fulfil applicable legal and/or regulatory reporting requirements.
- 3.5 We obtain your explicit consent through an opt-in before collecting any of the diversity information referred to in sections 2.1.13 and 3.4.

4. DISCLOSURE OF YOUR PERSONAL INFORMATION

- 4.1 We may share your Personal Information within LSEG in order to carry out our recruitment purposes. Access to your Personal Information is limited to those employees, agents and contractors of LSEG who



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need access to it in order to carry out our recruitment process, to communicate with you, and to carry out legal or regulatory obligations.

4.2 We may share your Personal Information with:

4.2.1 third parties with information related to your reference or application (for example, current or past suppliers and educational institutions); and

4.2.2 third parties who provide services such as reference, qualification and criminal checks (where such checks are appropriate and in accordance with applicable law).

4.3 We may also employ the services of third party service providers to help us in certain areas, such as IT and technical support. Where third party service providers receive your information, we will remain responsible for the use of your Personal Information. We take appropriate steps to ensure that such third parties treat your Personal Information with the same consideration that we do.

4.4 We may from time to time be required to disclose your Personal Information to law enforcement bodies, regulators, tax authorities, agencies or third parties under a legal requirement or court order. We act responsibly and take account of your interests when responding to any such requests.

5. CROSS-BORDER TRANSFERS OF YOUR PERSONAL INFORMATION

5.1 We are an international organisation, with businesses both inside and outside of the European Economic Area ("EEA"). Third party service providers who handle data on our behalf may be based in locations around the world, and we may also be subject to scrutiny from courts or regulators in a number of different jurisdictions. For these reasons, your Personal Information may be transferred to other countries both inside and outside of the EU and the EEA, including Malaysia, Sri Lanka and the United States of America. As privacy laws in other countries may not be equivalent to those in your home country, we only make arrangements to transfer data overseas where we are satisfied that adequate levels of protection are in place to protect any information held in that country or that the service provider acts at all times in compliance with applicable privacy laws. Where required under applicable laws we will take measures to ensure that Personal Information handled in other countries will receive at least the same level of protection as it is given in your home country, for instance by entering into contracts incorporating the European Commission approved model contract clauses.

6. RETENTION OF YOUR PERSONAL INFORMATION

6.1 We apply a general rule of keeping your Personal Information for as long as required to fulfil the purposes for which it was collected. However, in some circumstances we may retain Personal Information for longer periods of time, for instance where we are required to do so in accordance with legal, tax or accounting obligations.

6.2 In most circumstances, if you are an external candidate and are unsuccessful in your application for a role, we will dispose of your Personal Information six (6) months after the recruitment process ends. Where you agree, we may retain your CV to suggest future roles you may be suited to. If you are an existing LSEG staff member, we will retain your information in accordance with our Employee Privacy Notice.

6.3 LSEG will retain the anonymised, aggregated diversity data referenced in section 3.4 but such data will not be linked to, or capable of, identifying any individual.

6.4 In specific circumstances we may also retain your Personal Information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

6.5 We maintain a retention procedure which we apply to records in our care. In all cases, where your information is no longer required, we will ensure it is disposed of in a secure manner and, where required by applicable law, we will notify you when such information has been disposed of.

7. PROTECTION OF YOUR PERSONAL INFORMATION

7.1 We will hold your Personal Information securely whilst it is under our control, including where it is processed by third party service providers on our behalf. We train our employees in respect of their obligations under data protection laws, and we ensure that only relevant LSEG employees, contractors and agents have access to your Personal Information.



- 7.2 We take the security of our physical premises, our servers and our websites seriously and we will take all appropriate technical measures using recognised security procedures and tools in accordance with good industry practice to protect your Personal Information across all of these platforms.
- 7.3 Whilst we use all reasonable endeavours to protect your security in the manner described above, we consider that it is only appropriate to advise you that data transmission over the Internet and the World Wide Web cannot always be guaranteed as 100% secure, and therefore that you use our website and send us communications over the internet at your own risk.

8. YOUR RIGHTS

- 8.1 Subject to applicable law, you may have some or all of the following rights in respect of your Personal Information:
- 8.1.1 to obtain a copy of your Personal Information together with information about how and on what basis that Personal Information is processed;
 - 8.1.2 to rectify inaccurate Personal Information (including the right to have incomplete Personal Information completed);
 - 8.1.3 to erase your Personal Information (in limited circumstances, where it is no longer necessary in relation to the purposes for which it was collected or processed);
 - 8.1.4 to restrict processing of your Personal Information where:
 - 8.1.4.1 the accuracy of the Personal Information is contested;
 - 8.1.4.2 the processing is unlawful but you object to the erasure of the Personal Information;
 - 8.1.4.3 we no longer require the Personal Information, but it is still required for the establishment, exercise or defense of a legal claim
 - 8.1.5 to challenge processing which we have justified on the basis of a legitimate interest (as opposed to your consent, or to perform a contract with you);
 - 8.1.6 to prevent us from sending you direct marketing;
 - 8.1.7 to withdraw your consent to our processing of your Personal Information (where that processing is based on your consent);
 - 8.1.8 to object to decisions which are based solely on automated processing or profiling;
 - 8.1.9 In addition to the above, you have the right to lodge a complaint with the relevant supervisory authority. In the UK, that is the Information Commissioner's Office.
- 8.2 If you wish to investigate the exercising of any of these rights, please contact us using the details set out below.

9. CHANGES TO THIS PRIVACY NOTICE

- 9.1 Any changes we make to this Privacy Notice will be detailed on this page in order to ensure that you are fully aware of what Personal Information is collected, how it is used and under what circumstances it will be disclosed.

10. INFORMATION ABOUT THE DATA CONTROLLER AND CONTACT DETAILS

- 10.1 In relation to this website, your data controller will be London Stock Exchange Group plc. However, if your data controller is another member of the LSEG, we will make that information clear to you at the time your Personal Information is collected.
- 10.2 If you have any complaints or queries relating to the processing of your Personal Information by any member of LSEG, or to exercise any rights in respect of your Personal Information, please contact us by email at recruitment@lseg.com.

