

Applicant Privacy Notice

This privacy notice applies if you are applying for employment with Aspect Capital Limited.

Aspect Capital Limited is registered in the UK and our registered address is at 10 Portman Square, London, W1H 6AZ and our company registration number is 3491169.

Aspect Capital Limited is responsible for ensuring that it uses your personal data in compliance with data protection law. The purpose of this notice is to explain what personal data Aspect Capital Limited collects and how Aspect Capital Limited uses it. Please take the time to read and understand this privacy notice.

“**Aspect**”, “**we** or “**us**” means Aspect Capital Limited and other companies in the Aspect Capital Limited group (the “**Aspect Group**”), details of which can be found on our website. Where we use the terms “**Aspect**”, “**we**”, “**us**” and “**our**” in this notice, we are referring to the relevant Aspect Group entity to which you are applying for a position.

Where we use the term your “**Application**” in this notice, we are referring to your application to work at Aspect.

Personal data collected by Aspect

Aspect will collect and process (e.g. obtain, record, use, share or hold etc.) the following personal data about you:

- **Information that you provide to Aspect.** This includes information that you submit to us when you make your initial application and includes:
 - personal details such as, but not limited to, your full name, email address, contact details, employment history and qualifications (both academic and professional); and
 - any other details you provide in support of your Application, including (but not limited to) information contained in your CV and/or covering email and your reasons for applying to Aspect.
- **Information we, or other members of the Aspect Group, otherwise collect about you.** This includes information that is collected in connection with your Application and is likely to include:
 - personal data that we collect through your communication and correspondence with us (including but not limited to the content, date and time of your email correspondence); and
 - information obtained through any interviews and assessments with you.
- **Information we obtain from other sources.** This may include:
 - personal data that we collect from screening, background and/or reference checks we may perform on you as part of the Application or recruitment process, which may include your address history, your credit history, your qualifications (both academic and professional), your previously held directorships (if any); and
 - a criminal records check.

Uses of your personal data

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

- to consider your Application (including, in some cases, verifying your qualifications and references with those third parties you name);
- to meet our legal and regulatory obligations;

- to maintain consistent practices and procedures with respect to the collection, use, disclosure, transfer and processing of personal data across all Aspect Group companies worldwide. These practices and procedures include the effective recording, management and administration of personal data;
- to maintain consistent practices and procedures with respect to the recruitment of personnel across the Aspect Group, including the performance of human resources and other functions of the Aspect Group;
- for the purposes of equal opportunities monitoring; and
- to maintain contact with you in the future and notify you of relevant job vacancies with a member of the Aspect Group that you might be interested in. Please note that if you do not want us to retain your information, or want us to update it at any stage, please contact us in accordance with the “**Contacting us**” section below.

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

- we need to in order to take steps in preparation for entering into a contract with you, in particular to consider you for a position at Aspect;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and/or
- the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of another Aspect Group company), such as:
 - allowing us to effectively assess your skills, qualifications and/or the strength and merits of your Application and your suitability for the role applied for;
 - allowing us to effectively verify your information;
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to the recruitment of Aspect personnel worldwide; or
 - allowing us to contact you in relation to your Application and the recruitment process.

Please note, if your Application is successful and you are subsequently offered and accept employment at Aspect, the information we collect during the application and recruitment process will become part of your employment record.

Sensitive personal data

Certain forms of “sensitive personal data” are subject to specific protection or restriction by law in certain territories, including the EU. For these purposes, “sensitive personal data” is data relating to: racial or ethnic origin; criminal activity or proceedings in certain countries; political opinions; religious or philosophical beliefs; trade union membership genetic data, biometric data, data concerning health or sex life or sexual orientation. We will not process your sensitive personal data unless one of the following conditions is met:

- the processing is necessary for Aspect to carry out its obligations or exercise its specific rights in the field of employment law, social security or social protection law, including obligations in relation to public health, health

and safety and disability discrimination, the legality of personnel working in a particular jurisdiction, which will involve processing data in relation to nationality, work permits and visas, monitoring equality of racial or ethnic opportunity or treatment, and vetting (where necessary);

- the processing is necessary to protect the vital interests of you or another person where you are physically or legally incapable of giving consent;
- the data in question has been made public by you;
- the processing is necessary for the purpose of, or in connection with, any actual or prospective legal proceedings, for the purpose of obtaining legal advice or otherwise for the purposes of establishing, exercising or defending legal rights subject to applicable local legislation or where courts are acting in their judicial capacity;
- the processing is necessary for reasons of substantial public interest on the basis of local law which is proportionate to the aim pursued and which contains appropriate safeguarding measures;
- the processing is necessary for archiving purposes in the public interest or scientific and historical research purposes or statistical purposes; or
- as otherwise permitted by law.

In each case we will meet any additional local legal requirements and enforce any applicable duties of confidentiality effectively, for example in relation to access to health records.

Disclosure of your information to third parties

Within the Aspect Group

The Aspect Group may disclose your personal data to other members of the Aspect Group for the purposes of:

- the management and administration of the Aspect Group business, including the maintenance of centralised databases storing personal data;
- enabling each of the Aspect Group businesses to perform functions relating to Organisational Development decisions; or
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures within the Aspect Group.

Where personal data is disclosed to other members of the Aspect Group, we will take steps to ensure that the personal data is accessed only by those Aspect Group personnel that have a need to do so for the purposes described in this notice.

Outside the Aspect Group

In addition to the above, Aspect (and the other Aspect Group companies to whom your personal data is disclosed) may share your personal data outside the Aspect Group:

- to third party agents or contractors, bound by obligations of confidentiality, in connection with the processing of your personal data for the purposes described in this notice. This may include outsourced HR service providers and consultants, IT and communications service providers, law firms, providers of screening, background, credit and/or reference checks, accountants and auditors (“Third Parties”); and

- to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation.

International transfers of personal data

Your personal data may be transferred to and stored in databases hosted and maintained outside the UK. It may be stored and processed by other Aspect Group companies and/or Third Parties in other countries, which may include destinations outside of the European Economic Area (“**EEA**”).

Where your personal data is transferred outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of different ways, for instance:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with applicable data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the “**Contacting us**” section.

Retention of personal data

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

- the purpose for which we are using it – 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.

In some instances, we may retain your information to consider you for other roles and future opportunities at Aspect which may be of interest to you. If you do not want us to retain your information, or want us to update it at any stage, please contact us in accordance with the “**Contacting us**” section.

Your rights

You have a number of legal rights in relation to the personal data that we hold about you and you can exercise your rights by contacting Aspect’s Organisational Development team.

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;

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- 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 (and not, for the avoidance of doubt, information we, or other members of the Aspect Group, otherwise collect about you or information we obtain about you from other sources);
 - 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 request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request;
 - the right to object to our processing of your personal data in certain circumstances. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to continue to process it; and
 - the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office (<https://ico.org.uk/>), if you think that any of your rights have been infringed by us.

Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed in this notice, please contact us using the following contact information:

Address: 10 Portman Square, London, W1H 6AZ

Email Address: recruitment@aspectcapital.com