

The Bank of East Asia, Limited in the United Kingdom

## **Employee Privacy Notice - Recruitment**

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during the application process and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (also referred to as a 'privacy notice').

### **Who collects the information**

The Bank of East Asia, Limited in the United Kingdom ("**the Bank**") is a 'data controller' and gathers and uses certain information about you. This information is also used by our group entities, e.g. The Bank of East Asia, Limited which has its headquarters in Hong Kong, The Bank of East Asia (China) Limited in Chinese Mainland, and other subsidiaries and overseas branches of The Bank of East Asia, Limited, etc. Therefore, in this notice, references to 'we' or 'us' mean the Bank and our group entities.

### **Data protection principles**

We will comply with the data protection principles when gathering and using personal information.

## **About the information we collect and hold**

### **What information**

We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Information regarding your criminal record; and
- Details of your referees.

During the initial stage of the recruitment process (up to shortlisting) you may provide us with information about your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs. We will not actively collect such information in the course of the recruitment process. However, if you do provide us with such information, it will not be used by us for any purpose other than as described in this Recruitment Privacy Notice and will be held by us in accordance with the principles set out in this Recruitment Privacy Notice.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications;
- Information from regulators where regulatory approval is required in relation to your role, including information about your regulated status and, where applicable, regulatory references;
- Information regarding your criminal record, in criminal records certificates and enhanced criminal records certificate and/ or any information or records relating to suspected, alleged or actual criminal activity; and
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information.

You are required (by law or in order to enter into your contract of employment) to provide the categories of information above to us to enable us to verify your right to work and suitability for the position.

### **How we collect the information**

We may collect this information from you, your referees (details of whom you will have provided), your education provider, the relevant regulator, any relevant professional bodies, the Disclosure and Barring Service (DBS) and the Home Office.

### **Why we collect the information and how we use it**

We will typically collect and use this information for the following:

- To take steps to enter into a contract;
- For compliance with a legal obligation (e.g. our obligation to check that you are eligible to work in the United Kingdom);
- For the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms; and
- For performing background checks before your employment

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

### **How we may share the information**

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share personal information with our regulators or as required to comply with the law.

## **Where information may be held**

Information may be held at our offices and those of our group entities, service providers, representatives and agents as described above. For the reasons described above information may be transferred internationally to Hong Kong, Chinese Mainland and potentially to other countries and regions around the world, including countries and regions that do not have data protection laws equivalent to those in the UK. We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our data protection policy.

## **How long we keep your information**

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by the Bank, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, specifically, for one year. If there is a clear business reason for keeping recruitment records for longer than this period we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

## **Your rights to correct and access your information and to ask for it to be erased**

Please contact our Data Protection Officer (“DPO”) who can be contacted by email on [DPO@hkbea.co.uk](mailto:DPO@hkbea.co.uk) or by telephone 020 7208 3803 if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our DPO for some but not all of the information we hold and process to be erased (the ‘right to be forgotten’) in certain circumstances. You may also contact the Bank’s Head of Human Resources in respect of any such requests. We hope that the Bank can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.