



MANDARA

## CANDIDATE PRIVACY NOTICE

*Candidate privacy notice (GDPR)*

### **What is the purpose of this document?**

Mandara Energy Limited (“Mandara”) is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is relevant because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### **Data protection principles**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **The kind of information we hold about you**

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, address, telephone number and personal email address.
- Any information you provide to us during an interview or discussions before or after an interview.
- Test results obtained during the interview process.
- Psychometric test results (in most or all instances).

We may also collect, store and use the following types of more sensitive personal information if you choose to disclose it to us:

- Information about your health, including any medical condition or disability.

We may also collect, store and use the following types of more sensitive personal information if we make a conditional offer to you, or if you disclose this information in any case of your own initiative:



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- Information about criminal convictions and offences.

We generally do not collect, store and use the following types of more sensitive personal information if you choose to disclose it of your own initiative – however it may be collected and stored if it appears in material that we need to keep for the purposes of our recruitment process.

### **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies.

and, if we make a conditional offer to you:

- Our background check provider, from which we collect the following categories of data: information about criminal convictions and offences, information about your current and previous work, information about your studies and educational qualifications, information confirming your identity and address, information about adverse financial events.
- The official Disclosure and Barring Service, in respect of criminal convictions and similar.
- Your named referees, from whom we collect the following categories of data: your job title and responsibilities, period of employment, reason for leaving, referees' duration of working with you, referees' view of your professional performance and record.
- LinkedIn, a publicly accessible source.

### **How we will use information about you**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the relevant role since it would be beneficial to our business to appoint an appropriate person to that role.

We also need to process your personal information to decide whether to enter into a contract of employment or engagement with you.

Having received your CV and covering letter and/or your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview, and any test results from an interview, to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and (in almost all instances) carry out a criminal record check before you can pass probation.



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### **If you fail to provide personal information?**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### **How we use particularly sensitive personal information?**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

### **Information about criminal convictions?**

We envisage that, where applicable, we will process information about criminal convictions.

We will collect information about your criminal convictions history if we have offered or have decided to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- All trading roles require a high degree of trust and integrity since they involve discretionary investment management of client money, and so a basic disclosure of the candidate's criminal records history will be necessary.
- All Direct Trades roles require a high degree of trust and integrity since they involve undertaking transactions with client assets, and so a basic disclosure of the candidate's criminal records history will be necessary.
- All finance roles require a high degree of trust and integrity since they involve access to company and client finances, and confidential financial information including personal data, and so a basic disclosure of the candidate's criminal records history will be necessary.
- All Legal & Compliance roles require a high degree of trust and integrity since they involve access to company and client finances, and confidential financial information including personal data, and so a basic disclosure of the candidate's criminal records history will be necessary.
- All HR roles and roles supporting HR require a high degree of trust and integrity since they involve access to company and client finances, and confidential financial information including personal data, and so a basic disclosure of the candidate's criminal records history will be necessary.
- All Middle Office roles require a high degree of trust and integrity since they involve access to company and client finances, and confidential financial information including personal data, and so a basic disclosure of the candidate's criminal records history will be necessary.
- All Tech roles require a high degree of trust and integrity since they involve access to company and client finances, and confidential financial information including personal data, and so a basic disclosure of the candidate's criminal records history will be necessary.
- All management roles require a high degree of trust and integrity since they involve access to company and client finances, and confidential financial information including personal data, and so a basic disclosure of the candidate's criminal records history will be necessary.



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We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data sharing**

#### Why might you share my personal information with third parties?

Your personal information will be processed on Jazz HR, which is a recruitment technology platform, Indeed, and by LinkedIn if you choose to apply via LinkedIn. In relation to psychometric test results, this will be collected by and therefore shared with TMS and/or SOSIE, which provide psychometric testing services. In addition, we may disclose personal information to BRD Consulting (Singapore) for organisational development purposes. Nevertheless, all our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Jazz HR Privacy Policy: <https://www.jazzhr.com/privacy-policy/>

Indeed Privacy Policy: <https://hrtechprivacy.com/brands/indeed>

LinkedIn Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

### **Data retention**

#### How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to offer you the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited



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grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis of consideration for further opportunities, we will contact you, seeking your explicit consent to retain your personal information on that basis.

### **Rights of access, correction, erasure, and restriction**

#### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [dataprotection@mandaracapital.com](mailto:dataprotection@mandaracapital.com).

### **Right to withdraw consent**

When you applied for this role, you provided implicit consent for us to process your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact [dataprotection@mandaracapital.com](mailto:dataprotection@mandaracapital.com). Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### **Data privacy management**

We have appointed a team for data privacy management to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the



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data privacy team on [dataprotection@mandaracapital.com](mailto:dataprotection@mandaracapital.com). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.