

Privacy statement

For Potential Employees,
Workers and Contractors

Privacy statement

This notice applies to the following Sanlam companies: Sanlam UK Limited, Sanlam Life & Pensions UK Limited, Sanlam Wealth Planning UK Limited, English Mutual Limited, Sanlam Private Investments (UK) Ltd, Sanlam Investments UK Limited and Sanlam Partnerships Limited (Sanlam UK Group).

This privacy notice describes how we collect and use personal data about you during the recruitment process, in accordance with the General Data Protection Regulation (GDPR). Personal data means any information about you from which you can be identified.

What is the purpose of this document?

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

How is your personal data collected?

We typically collect personal data about you directly through the application and recruitment process, from an employment agency, a credit reference agency or other background check provider, the Disclosure and Barring Service, referees and publicly accessible data.

If you fail to provide personal data

If you fail to provide certain information when requested, we may not be able to adequately assess your suitability for the role for which you have applied, or we may be prevented from complying with our legal obligations. In particular, if we cannot undertake a valid credit reference check then, as an FCA regulated business, we will be unable to proceed with your application.

Situations in which we will use your personal data

We need the categories of information in the list below primarily to allow us to assess your suitability for the role for which you have applied and to enable us to comply with legal obligations. In some cases we may use your personal data to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

Type of Data	Reasons for Processing
Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.	Administering our contact with you during the recruitment process.
Work history, training records and professional memberships.	Assessing qualifications for a particular job or task.
Information provided by you and collected by us on interview notes.	To assess your suitability for the role for which you have applied
Copy of passport, driving licence or birth certificate.	To comply with our legal obligations and to carry out background and reference checks on you.
Copies of right to work documentation (permit/visa), CV or cover letter or provided by you on application forms as part of the application process. CCTV footage.	Making a decision about your recruitment or appointment. Checking your legal entitlement to work in the UK. To comply with our legal obligations. Security of our building.

We may also collect, use and store the following special categories of more sensitive personal data:

Type of Data	Reasons for Processing
Information about your health, including any medical condition or disability.	To enable us to assess your suitability for the role for which you applied and to consider whether we need to provide appropriate adjustments during the recruitment process.
Information about criminal convictions and offences.	To assess your suitability for the role and to make a final decision about your recruitment or appointment.

We may only use information relating to criminal convictions where the law allows us to do so or to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the Financial Conduct Authority to carry out criminal record checks for those carrying out regulated roles

This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Sanlam UK Group Data Protection Policy.

Otherwise, we will not ordinarily ask you to disclose any special categories of more sensitive personal data at this stage. However, in circumstances where you freely offer such information, such as on your CV or during an interview, we will not use that special personal data for any reason whatsoever and will ordinarily destroy, redact or erase such special personal data as soon as it is received by us. Under no circumstances will such special personal data ever be used to assess your suitability for the role for which you have applied. We will only ever retain such special personal data to comply with a legal obligation, where you have specifically consented to us doing so or to protect your vital interests.

If we seek your consent, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated Decision Making

Currently, no decisions will be taken about you using automated means, however, we will notify you in writing if this position changes.

Data sharing

We may share your personal data with third parties (e.g. Experian for ID and credit checks) where required by law, where it is necessary to assess your suitability for the role for which you have applied or where we have another legitimate interest to do so, (e.g. with other Sanlam group companies for internal reporting purpose).

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal data 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.

Transferring information outside the EU

We do not envisage that your personal data will be transferred outside of the EU.

Data security

Sanlam UK Group is committed to protecting the privacy and security of your personal data. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Group Head of HR.

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.

How long will you use my information for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for including, for the purposes of satisfying any contractual, legal, accounting, or reporting requirements. If you are successful in your application your personal data will be retained in line with the Sanlam UK Group Data Retention Policy but if you are unsuccessful we will only retain your personal data for 6 months following your application. In the case of speculative CVs (which do not result in a recruitment offer), we will only retain your personal data up to 31 December each year, following the date on which you submitted your CV to us, to enable us to consider you for similar roles using relevant data.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the recruitment process.

Your rights in connection with personal data

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

- Request access to your personal data (commonly known as a "data subject access request").
- Request correction of the personal data that we hold about you.
- Request the erasure of your personal data.
- **You also have the right to object to us processing personal data where we are doing so based on our legitimate interest. If you ask us to stop processing your personal data on this basis, we will stop processing your personal data, unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws.**
- Request the restriction of processing of your personal data.
- Request the transfer of your personal data to another party

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the Group Head of HR in writing.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded, repetitive, vexatious or excessive.

Complaints

In the first instance please contact the HR Department (Human.Resources@sanlam.co.uk). You also have the right to make a complaint to our Data Protection Department (dataprotection@sanlam.co.uk). If you are still not satisfied that your query has been resolved you have the right to contact the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

T 0303 123 1113 (local rate) or
01625 545 745 if you prefer to
use a national rate number

F 01625 524 510

Sanlam companies

This *Privacy statement* applies to the activities of the following Sanlam group companies, whose identity and details are provided in the relevant terms governing your product or service:

- Sanlam Life & Pensions UK Limited, Sanlam Financial Services UK Limited (trading as Sanlam Investments and Pensions) and Sanlam Trustee Services UK Limited, which provide life and pension products and a wrap administration service for onshore bonds and ISAs.
- Sanlam Wealth Planning UK Limited and English Mutual Limited which provide financial advice.
- Sanlam UK Limited and Sanlam Investment Holdings UK Limited, which are our holding companies. Sanlam UK Limited provides our website.

The above companies' registered office is: St. Bartholomew's House, Lewins Mead, Bristol BS1 2NH.

- Sanlam Private Investments (UK) Limited and Sanlam Securities UK Limited, which provide retail and institutional investment management services comprising discretionary and advisory fund management and stockbroking. The registered office for these companies is 16 South Park, Sevenoaks, Kent TN13 1AN.

Changes to this Privacy statement

We reserve the right to update this Privacy statement at any time, and we will notify you if we make any substantial updates. We may also notify you in other ways about the processing of your personal data. You should check our website at www.sanlam.co.uk periodically to view the most up to date *Privacy statement*.

What if you have queries about this Privacy statement or the way Sanlam uses your personal data?

If you wish to exercise any of your rights, or you have any questions about this Privacy statement, how we handle your personal data or if you wish to make a complaint, please contact us as follows:

Data Protection
Sanlam
St. Bartholomew's House
Lewins Mead
Bristol BS1 2NH

E clientservices@sanlam.co.uk

T 0117 975 2222

Monday to Friday from 9am to 5pm
(excluding Bank Holidays).

Sanlam is a trading name of Sanlam Private Investments (UK) Ltd (SPI, registered in England and Wales 2041819), Sanlam Wealth Planning UK Ltd (SWP, registered in England and Wales 3879955), English Mutual Ltd (EML, registered in England and Wales 6685913), Sanlam Life and Pensions UK Ltd (SLP, registered in England and Wales 980142), Sanlam Trustee Services UK Limited (STS, registered in England and Wales 01489455), Sanlam Securities UK Limited (SSUK, registered in England and Wales 01825671), Sanlam Investment Holdings UK Limited (registered in England and Wales 07812240), Sanlam UK Limited (SUK, registered in England and Wales 06575962) and Sanlam Financial Services UK Ltd (SFS, registered in England and Wales 2354894). SPI, SWP, SSUK and SFS are authorised and regulated by the Financial Conduct Authority. EML is an appointed representative of SWP. SUK is an appointed representative of SLP, SFS, SPI and Sanlam Investments UK Limited. SLP is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Registered office for SPI and SSUK: 16 South Park, Sevenoaks, Kent TN13 1AN. Registered office for SWP, SLP, SFS, STS, SIH, SUK and EML: St. Bartholomew's House, Lewins Mead, Bristol, BS1 2NH.

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