

Job Applicant Privacy Notice

This Job Applicant Privacy Notice sets out how Crestbridge collects and handles personal information about you when you apply to work for Crestbridge whether on a voluntary or paid basis and whether that work is undertaken as an employee, contractor, secondee or work experience student.

We take the privacy and security of your personal information very seriously and will only use your personal information as set out in this Job Applicant Privacy Notice or as we may otherwise inform you from time to time.

As a job applicant to become an employee, contractor, secondee or work experience student at Crestbridge then the Controller of your personal information throughout the application process will be:

Crestbridge Group Services Limited,
47 The Esplanade,
St. Helier,
Jersey,
JE1 0BD

which houses Crestbridge’s centralised Human Resources team.

Following successful completion of your application and in the event you come to work for Crestbridge we will continue to process your personal information but in accordance with our Staff Privacy Notice <https://careers.crestbridge.com/> which sets out, amongst other things, the details of the new Crestbridge controller of your personal information in those circumstances.

“Crestbridge”, “we”, “us”, “our” in this Job Applicant Privacy Notice are references to Crestbridge Group Services Limited.

Crestbridge has an appointed Data Protection Officer who can be contacted at:

The Data Protection Officer,
Crestbridge Group Services Limited,
47 The Esplanade,
St. Helier,
Jersey,
JE1 0BD

or by email: dpo@crestbridge.com

1. What information does Crestbridge collect and why?

As part of any recruitment process, Crestbridge collects and processes personal data relating to job applicants. Crestbridge is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Crestbridge collects and/or processes a range of information about you for various purposes.

This may include the following personal information:

	Information	Purpose	Primary Legal Basis
1.1	Your name, title, address and identification documentation such	To identify you and enable Crestbridge to take steps to	Contract and Legal Obligation

	as passport or driving licence and recent utility bill or bank statement.	offer and provide you with a contract and undertake any necessary screening checks.	
1.2	Your email address and telephone number.	To enable Crestbridge to communicate with you over the recruitment process and to take steps to offer and provide you with a contract.	Contract
1.3	Date of birth and gender.	To comply with employment legislation and equal opportunities and anti-discrimination legislation and undertake any necessary screening checks.	Legal Obligation
1.4	Details of your existing / past employment remuneration (salary and benefits details).	To ensure our expectations are aligned in terms of proposed salary and benefits for your potential new role.	Legitimate Interests
1.5	Terms and conditions of your potential employment.	To comply with employment legislation in terms of the provision of employment terms.	Legal Obligation
1.6	Your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Crestbridge.	To ensure you are appropriately qualified and experienced for the job and/or to help facilitate any employee screening checks required.	Legitimate Interests and Legal Obligations
1.7	Remuneration and tax details, including entitlement to benefits such as pensions or insurance cover.	To comply with contractual requirements and employment, tax and social security legislation.	Contract and Legal Obligation

1.8	National insurance or social security number (or regional equivalent).	To comply with employment, tax and social security legislation.	Legal Obligation
1.9	Marital status, next of kin, dependants.	To comply with contractual requirements including as regards to benefits.	Contract
1.10	Nationality and entitlement to work in the jurisdiction in which you are employed.	To comply with applicable immigration and licensing laws, and/or to help facilitate any employee screening checks required.	Legal Obligation
1.11	Information about whether you are an undischarged bankrupt, or have an arrangement with creditors or other external administration.	To ensure you are appropriately qualified for the job and/or to help facilitate any employee screening checks required.	Legal Obligation
1.12	Information about any act, neglect or default which would not allow you to be a member of any professional institute;		Legal Obligation
1.13	Details of your schedule (days of work and working hours) and attendance at work;	To comply with contractual requirements including as to holiday, flexible/agile working.	Contract
1.14	CCTV images and electronic, telephonic or written correspondence between us.	<p>CCTV images may be collected if you come to our offices for a physical interview or to drop in or collect any paperwork. These images are primarily collected for the prevention, detection, investigation and prosecution of fraud or other unlawful acts.</p> <p>CCTV imagery may also be collected for health and safety purposes.</p>	<p>Legal Obligations (to prevent certain criminal actions which may include bribery, tax evasion, money laundering or fraud); and/or</p> <p>Legal Obligations - regulatory (where electronic or telephonic correspondence is "business correspondence"); and/or</p>

		Electronic, telephonic or written correspondence will be used to communicate with you during the recruiting process.	Legitimate Interests; and/or To Establish, Exercise or Defend Legal Claims.
1.15	Leave taken by you, including holiday, sickness absence, family leave, study leave, secondments and sabbaticals and the reasons for the leave.	To facilitate the administration of your contractual rights and obligations and comply with any applicable employment law.	Contract and Legal Obligations
1.16	Details of any grievances you have raised or otherwise spoken-up about to bring to our attention.	To address these as per Crestbridge's legal obligations under employment and other applicable laws.	Legal Obligations
1.17	Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.	To comply with employment legislation.	Legal Obligations
1.18	Training you have, are or will be participating in as well as reports from training providers, mock exam results and actual exam results for professional qualifications.	To comply with any contractual obligations and address applicable regulatory (such as data protection and money laundering) laws regarding staff training and continuous professional development.	Contract and Legal Obligations
1.19	Assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence.	To ensure you are performing appropriately, to assess pay and fitness for promotion, discretionary bonus, LTIP entitlement, and meet contractual requirements.	Legitimate Interests and Contract

When using our website you should also please refer to our Cookies and Website Tracking Tools information at <https://www.crestbridge.com/cookies>.

It may also include the following special category / sensitive personal data:

	Information	Purpose	Legal Basis
1.20	Criminal Record.	As a regulated business Crestbridge is obliged to screen its employees,	Legal Obligation

		including undertaking criminal record checks.	
1.21	Medical / Health (including disabilities or maternity/paternity).	To comply with employment legislation and equal opportunities and anti-discrimination legislation.	Legal Obligation and Vital Interests
1.22	Details of any trade union memberships held.	To check off for union subscriptions / attendance.	Legal Obligation
1.23	Ethnic origin.	To comply with equal opportunities and anti-discrimination legislation.	Consent
1.24	Sexual orientation.		
1.25	Religious or philosophical beliefs.		

Whilst processing is predominantly required to comply with Crestbridge's Legal Obligations or is necessary to take steps to enter you into a Contract with Crestbridge in the context of Crestbridge's potential staff relationships then where circumstances require it and we are lawfully permitted to do so Crestbridge may also process personal information in this context as necessary in order for Crestbridge to:

- prevent and detect unlawful acts/fraud; and/or
- exercise, bring or defend legal claims.

Such information may be shared with Crestbridge's professional advisers for the purpose of obtaining advice, Crestbridge's insurers, and with investigative and prosecuting authorities and ultimately with the courts or mediation authorities.

Your personal information, not including special category/sensitive information, may also be shared within the Crestbridge group of companies in our legitimate interests for staff administration purposes and subject to Crestbridge's compliance with any laws regarding the lawful sharing of that personal information.

Where we do process personal information pursuant to a Legal Obligation then we will retain this information during the staff member's employment and are obliged to retain it for a prescribed period of time post the end of our employment relationship, typically a minimum of 5 years.

We may also then continue to hold / process the personal information post the end of that prescribed period in order that we may exercise, bring or defend legal claims during the legal limitation / prescription periods for bringing such a contract and/or tort/civil wrong claim as may apply under the relevant jurisdictional law.

2. Where we obtain your personal information

	Source
2.1	<p>Information you provide directly to Crestbridge:</p> <ul style="list-style-type: none"> a) on such forms and documents (for example your C.V.) as you may complete and provide to us either by way of enquiry or as we may require from you in respect to any position at Crestbridge we liaise with you over; or b) on such documents as are submitted to us as part of our staff screening procedures and/or in compliance with any other statutory or regulatory requirements; c) (c) any personal information provided by way of correspondence with us by telephone, e-mail, in interview or other forms of assessment.
2.2	<p>Information Crestbridge receives about you from third party sources being:</p> <ul style="list-style-type: none"> (a) your referees / previous employers; (b) our employment screening/background check providers; (c) companies registries, court databases, published sanctions/sanctions databases, financial crime databases or credit reference databases; (d) regulators or other official authorities; (e) other publicly available information such as published articles and online content. <p>Crestbridge will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.</p>
2.3	<p>Information Crestbridge obtains through monitoring activities undertaken by us via:</p> <ul style="list-style-type: none"> (a) CCTV and/or electronic swipe card use in our different office premises – please refer to the relevant Crestbridge office’s CCTV and/or swipe card privacy notice information when you visit us; (b) Cookies and similar technology in use on our website(s) – please refer to our Cookies and Website Tracking Tools information at https://www.crestbridge.com/cookies.

3. Sharing personal information

Unless otherwise stated then Crestbridge may share your personal information:

3.1.1	within our Crestbridge group of companies (a list of Crestbridge regulated affiliates and their contact details is at https://www.crestbridge.com/regulatory) for staff administration purposes and, in particular, to any would be Crestbridge employing company;
3.1.2	with certain approved third-party service providers including our staff screening / employment check and benefit providers;
3.1.3	where we need to contact any of your referees / past employers to obtain employment references;
3.1.4	with any recruitment / employment agency that has referred you to us;
3.1.5	where we are subject to a legal obligation that necessitates the sharing of this information with other parties such as regulatory authorities, tax and revenue authorities, companies registries, governmental departments, courts and law enforcement authorities.

The Crestbridge group companies to whom your personal information may be transferred are based in the following jurisdictions: Jersey, the UK, Luxembourg, Ireland and the United States.

The third-party service providers to whom your personal information may be transferred are based primarily in the countries / territories where we have a jurisdictional presence, but may also be based in other European Economic Area countries, and in a few exceptional circumstances outside of the European Economic Area or those other countries / territories in which we have a jurisdictional presence.

3.2 Where we share your personal information with group companies and/or third party service providers outside of the European Economic Area, and where we are not otherwise subject to a legal obligation to share your personal information, then we require the recipients of that personal information to put in place adequate measures to protect it, including by entering into appropriate data sharing agreements such as the EU standard contractual clauses. If you would like further information about the safeguards we have in place to protect your personal information, please contact dpo@crestbridge.com.

4. Retention of personal information

4.1 Unless otherwise stated your personal information will be retained for as long as required:

4.1.1	by applicable laws or regulatory requirements;
4.1.2	for the purposes for which the personal information was collected;
4.1.3	in order to establish or defend legal rights or obligations.

6. Human Resources & Facilities

			Retention Trigger	Retain For	Action	Retention Source	IAO
6.1	Recruitment	6.1.1 Job applications and interview records for unsuccessful candidates (including CV's, correspondence and interview notes)	Last Action	12 months	Destroy	Business Need	Group Head of HR
		6.1.2 Job applications and interview records for successful candidates (including CV's, correspondence)	End of Employment				

		and interview notes)					
6.2	Onboarding	6.2.1 Pre-screening reports, right to work documentation, references, DBS checks	End of Employment	10 years	Destroy	Regulatory Requirement	
		6.2.2 Personal details form	Start of Employment	3 months		Business Need	

If your application is unsuccessful, Crestbridge will ask your consent to keep your personal information on file in case there are future employment opportunities for which you may be suited.

Should you consent to this purpose then you are free to withdraw your consent at any time.

5. Your Data Protection Rights

5.1 Depending on the country or territory in which Crestbridge’s processing of your personal information takes place and/or where you are then, subject to any relevant conditions or exemptions, you may have some or all of the following rights in respect of the personal information about you that we process:

5.1.1	the right to access and obtain a copy of your personal information;
5.1.2	the right to correct inaccurate, incomplete or outdated personal information;
5.1.3	the right to erase personal information;
5.1.4	the right to restrict our processing of your personal information;
5.1.5	the right to object to our processing of your personal information (in particular for marketing purposes or where it is processed in our legitimate interests);
5.1.6	the right not to be subject to a decision based solely on the automated processing by us of your personal information;
5.1.7	the right to port (i.e. move) your personal information;
5.1.8	the right to compensation where we or another organisation has caused you damage as a result of our processing of your personal information;
5.1.9	the right to seek a judicial (i.e. court) remedy where you consider we have acted or are about to act in breach of the relevant data protection legislation.

5.2 You also have the right to lodge a complaint about our handling of your personal information with a relevant data protection supervisory authority either in the country/territory in which you are located and/or in the jurisdiction in which we are located and process your personal information.

For a list and contact details of the data protection regulatory authorities in our different jurisdictions please see [Data Protection Supervisory Authorities](#).

Whenever you are considering lodging a complaint however we should please be grateful if you would first allow us the opportunity to resolve your complaint by addressing it in writing, and providing as much detail as possible, to dpo@crestbridge.com.

5.3 If we ever rely on your consent to process your personal information, you also have the right to withdraw that consent at any time.

5.4 If you wish to receive more information about your data protection rights or to exercise any of your rights, please contact dpo@crestbridge.com.

6. What if you do not provide personal information?

You are under no statutory or contractual obligation to provide personal information to Crestbridge during the recruitment process however, if you do not provide the information, Crestbridge may not be able to process your job application properly or at all and this may ultimately result in our withdrawing your application from the process or being unable to offer you employment with Crestbridge.

7. Inaccurate or amended information

Please let us know as soon as possible if any of the personal information we hold about you changes (including your correspondence details).

Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to run the recruitment process and/or hire you.

8. Your acknowledgment of this Privacy Notice

By submitting information to us as part of any recruitment process you acknowledge having received and read this Privacy Notice.

9. Questions

If you have any questions about this Privacy Notice or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact dpo@crestbridge.com.