

JTC RECRUITMENT PRIVACY NOTICE

Your privacy is important to us at JTC. This privacy notice explains what personal data (“Personal Data”) JTC collects from you either directly or through our interactions with you and how we use that data.

This Privacy Notice covers our handling of information that we gather from you during the recruitment stage. Within JTC, we collect various types of information, including information that identifies you as an individual (“Personal Data”) and certain kind of sensitive information known as “Special Category Data”, both of which are detailed below.

It is important that you read and retain this notice, so that you are aware of how and why we are using the information collected and what your rights are under the data protection legislation.

1 INITIAL STAGE OF RECRUITMENT – CANDIDATE APPLICATION

All information collected in the candidate application process is detailed below. We use the information collected to determine your (“the candidate”) career history, your experience and expectations against the vacancy, the legality around your right to live and work in the jurisdiction in which the recruitment is occurring. The latter is needed in order to ascertain if the local legislative requirements are met or if further consideration will need to be given to provide a work permit/licence.

Application data and information supporting our decision-making process may be obtained by the JTC Group Resourcing Team from you directly, or from our appointed recruitment agency or from our third-party background screening provider. You will not be subject to automated decision-making. All applications are reviewed by our Group Resourcing Team.

While JTC requests a covering letter and Curriculum Vitae (CV) to provide insight into the above, JTC has no control over the information you wish and choose to submit as part of your application. JTC will treat all information contained within the CV and covering letter as strictly confidential and in line with data protection legislation and best practice.

PERSONAL DATA COLLECTED	LEGAL BASIS FOR PROCESSING	INTENDED RECIPIENTS	STANDARD RETENTION PERIODS
Full Legal Name (as recorded on right to work documents) and preferred name	Legal Obligation & To prepare contractual documents	HR Group Resourcing Team (HR), Hiring Lead	For successful candidates: Employment Duration & in line with the JTC Retention policy. For unsuccessful candidates: 6 months.
Email address	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
Telephone Numbers	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
Jurisdiction	Legal Obligation	HR Group Resourcing Team (HR), Hiring Lead	
Right to Work/residential status	Legal Obligation	HR Group Resourcing Team (HR), Hiring Lead	

Salary Information	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
Professional Qualification (where applicable)	Legal Obligation and Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
Conflicts of Interest	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead, Risk & Compliance (R&C)	
CV	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
Covering Letter	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	

2 SECOND STAGE OF RECRUITMENT – CANDIDATE ASSESSMENT

Following candidate shortlisting, if successful, you will be invited to attend interviews with the relevant hiring manager(s) and then HR.

All information directly requested in the candidate assessment process is detailed below. We use this information to determine which candidate has the most applicable and transferrable expertise and subsequently would best suit the role as well as JTC as a company.

During the assessment process, you will be asked set interview questions which contain personal information around previous job history and salary which all support the recruitment decision. JTC cannot directly control all the information you wish and choose to share at this stage. However, all information obtained through this process will be treated as strictly confidential and in line with data protection legislation and best practice.

PERSONAL DATA COLLECTED	LEGAL BASIS FOR PROCESSING	INTENDED RECIPIENTS	STANDARD RETENTION PERIODS
Salary and Benefits Information	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	For successful candidates: Employment Duration & in line statutory requirements For unsuccessful candidates: 6 months.
Professional Qualification Status & Costs	Legal Obligation & Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
Motivations for Application, job role,	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
Working experience (in depth)	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	

Behavioural Questions (e.g team working, communication style)	Legitimate Interest	HR Group Resourcing Team (HR), Hiring Lead	
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3 FINAL STAGE OF RECRUITMENT – CANDIDATE PRE-SCREENING

Following the assessment process, if successful, you will be offered a role with JTC. In order to prepare the contract of employment and conduct pre-employment screening the information listed below will be collected. We use this information for world check, identity verifications, as well as, to finalise the offer of employment and prepare the contract of employment.

PERSONAL DATA COLLECTED	LEGAL BASIS FOR PROCESSING	USAGE FOR DATA	INTENDED RECIPIENTS
Salary & benefits - new role	To prepare a contract	Required as a core part of contract of employment	HR, Hiring/Line Managers, Finance, 3 rd party payroll services
Job Title & Level	To prepare a contract	Required as a core part of contract of employment	HR, Hiring/Line Managers, IT, Risk & Compliance, Business Development & Marketing
Address & Postcode	To prepare a contract	Required for World Check and to complete the employee contract	HR, Risk & Compliance, 3 rd party healthcare providers, 3 rd party payroll services
Date of Birth	To prepare a contract	Required for World Check, to complete the employee contract and to provide to pension / healthcare provider for statutory entitlements	HR, Risk & Compliance, 3 rd party benefit & pension providers, 3 rd party payroll services, Work permit submission, HR Reports, Company Secretariat (if Signatory)
Previous Names	Legitimate Interest	Required for world check and data verifications	HR, Risk & Compliance (broader organisation where the name change occurs during employment)
Nationality	Legitimate Interest & To prepare a contract	Required for world check and data verifications. Legal requirement for reporting in certain jurisdictions	HR, Risk & Compliance, 3 rd party benefit & pension providers, work permit submission,
Educational achievements (exams, grades, achievement)	Legitimate Interest	Verification of educational achievements and relevant educational studies to the role	HR, Hiring Managers, work permit submissions



dates) – Inc. certificates			
Professional qualifications – current study or completed – Inc. certificates	Legitimate Interest & Legal Obligation	Verification of professional qualifications as stated in the interview process, this will Impact on suitability for the role and financial services commission requirements. Current study to see take on costs for JTC, should this be agreed.	HR, Risk & Compliance, Internal Board reports, Finance (current study, take on costs), Line Manager
Membership of licenced body/ membership number and joining date – Inc. evidence	Legitimate Interest	Verification of professional memberships as this may impact on suitability for the role and financial services commission requirements.	HR, Risk & Compliance, Internal Board reports, Finance
Language Skills (not mandatory)	Legitimate Interest	Where employee wants to state (not compulsory). Supports with whether the employee can be used to translate with international clients and documentation	HR
Right to work status / evidence	Legal obligation	To ensure the employee is legally allowed to work in the jurisdiction in which JTC will be employing them	HR, manpower submissions
Pending and unspent criminal convictions (relating to Financial Services Industry)	Legitimate Interest & Legal Obligation	JTC need to know any unspent / current convictions and what they are for, given JTC is a registered financial services business and has regulatory requirements. If in a regulated role, spent convictions will also be considered. This information will be shared with Risk & Compliance if required.	HR, (Risk & Compliance, Group Counsel, COO and Group Board – if appropriate)
Shareholder, trustee or director responsibility in any business	Legal Obligation & Legitimate Interest	Stated as a criteria for declaration in Handbook to review any conflicts of interest with other responsibilities and to understand any time off requirements needed by the employee and whether JTC are still able to employ the individual.	HR (Risk & Compliance, Group Counsel, COO and Group Board – if appropriate)

Conflict of Interest	Legal Obligation	Stated as a criteria for declaration in Handbook to review any conflicts of interest with other responsibilities and requirements. JTC will use this information to determine if they are still able to employ the individual.	HR (Risk & Compliance, Group Counsel, COO and Group Board – if appropriate)
Medical Information (Chronic Illness/ Physical limitations/ disability/ special needs)	Vital interest & Legitimate Interest.	To understand whether the employee has any ongoing medical issues that JTC need to be aware of which may limit or have an impact on their ability to perform in the role. JTC can use this information to review how they best adapt the environment to suit the employee's needs.	HR, Health & Safety team, Facilities, First Aider (where appropriate), Line Manager
Work Reference	Legitimate Interest	Acts as a verification tool that information provided by the employee in the application process is factual and correct and to ensure any issues in the workplace that JTC should be aware of	HR, line manager (where appropriate), the Referee (provide full name of employee to referee name provided)

Information in addition to that stated above, may be collected throughout the recruitment process. Any information obtained by HR will be treated as confidential and in line with data protection legislation and best practice.

For background / pre-employment screening we use a third-party provider. You are required to submit the requested information via the secure online portal provided by the third-party. Prior to any submission you will be required to review and agree to the third-party providers Data Privacy Statement. More information on who we share your Personal Data with is provided in section 6 'Data Processing by Third Party' below.

Where any additional sensitive information is required, above and beyond that detailed above, you will be notified in writing on the condition for processing prior to such information being collected or processed.

4 DATA STORAGE AND TRANSFER

JTC is a global business operating in Jurisdictions outside of the countries in the EU and EEA. Please be aware that the information provided to us may be processed and stored outside of the EU and EEA. JTC is committed to ensuring that all jurisdictions, in which data is held and processed, abides by data protection legislation that is equivalent to those required in the EU and by EU GDPR.

5 DATA RETENTION

For all successful candidates, the information provided will be retained throughout the duration of their employment and in line with statutory requirements.

For candidates who are unsuccessful, the personal details you have shared with us will automatically be anonymised following 6 months inactivity in your candidate profile.

6 DATA PROCESSING BY THIRD PARTIES

JTC engages the services of various third-party services providers with respect to matters listed in the tables detailed in sections 1-3. We do not permit our third-party service providers to process your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

Third-party providers include, but are not limited to:

- Background and pre-employment screening providers
- Payroll providers
- Benefits & Pension providers

7 CCTV

CCTV is in operation in jurisdictions where required and necessary, all legal and regulatory obligations are upheld.

Please note that whilst CCTV is not monitored continually, recordings are stored on a secure JTC server should the need to review recordings be necessary.

8 YOUR PRIVACY RIGHTS

The Regulation and Laws: -

APPLICABLE JURISDICTION(S)	LAW(S) (NOT LIMITED TO)
Bahamas	Data Protection (Privacy of Personal Information) Act 2003
BVI	British Virgin Islands Data Protection Act (2021)
California	The California Consumer Privacy Act of 2018 (CCPA)
Cayman Islands	The Data Protection Law, 2017 (Law), as applicable to the Cayman Islands
Dubai	The DIFC Data Protection Law DIFC Law No.1 of 2007
Florida (Miami)	Florida Information Protection Act (2014)
Germany	The Federal Data Protection Act ("BDSG") 2018
Guernsey	The Data Protection (Bailiwick of Guernsey) Law 2017
Ireland	Data Protection Act (2018)
Isle of Man	Data Protection (Application of GDPR) Order 2018; Data Protection (Application of LED) Order 2018; GDPR and LED Implementing Regulations 2018, as applicable to the Isle of Man
Jersey	Data Protection (Jersey) Law 2018;

Massachusetts (Boston)	The Massachusetts Data Security Law
Mauritius	The Data Protection Act 2017
New York	The New York State Personal Privacy Protection Law + the Stop Hacks and Improve Electronic Data Security Act (SHIELD Act)
Singapore	The Personal Data Protection Act, 2012 as applicable to Singapore
South Africa	The Protection of Personal Information Act ("PPI Act") of 2013, as amend and applicable to South Africa
South Dakota	Constitution of the State of South Dakota + Senate Bill 62
Switzerland	the Federal Act on Data Protection, 19 June 1992 ('DPA') and several Ordinances; The Ordinance to the Federal Act on Data Protection ('DPO') and; The Ordinance of Data Protection Certification ('ODPC')
the Netherlands; Luxembourg; Austria	General Data Protection Regulation 2016 ("GDPR")
United Kingdom	The Data Protection Act 2018

Depending on where you reside and because of the implementation of one of the above, you have rights as an individual which you can exercise in relation to the information we hold about you.

Individual Data Rights:-

> **Right of access**

You have the right to know what personal data we hold about you and how we use it.

> **Right to rectification**

You have the right to have any errors in the data we hold for you corrected.

> **Right to erasure (to be forgotten)**

You have the right to request the deletion of all personal data relating to you.

> **Right to restriction of processing**

You have the right to restrict how we use your data, eg you can request that we do not process your data for a particular purpose or share it with third parties.

> **Right to data portability**

You have the right to be supplied with all of the personal data that we hold for you.

> **Right to object to processing**

You have the right to object to our use of your data.

> **Right not to be subject to a decision based solely on automated processing**

We do not base any decisions solely on automated processing of your personal data, but if we did, you would have the right to restrict our use of your data for this purpose.

> **Right to lodge a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us**

We can, on request, tell you which data protection authority is relevant to the processing of your personal information.

To make a request to JTC for any personal information we may hold, you can either call the GDPR team on +44 (0) 1534 700000, e-mail us on gdpr@jtcgroup.com or write to us at the address provided at the end of this document.

9 COMPLAINTS OR QUERIES

JTC strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of JTC's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address provided at the end of this document.

If you want to make a complaint about the way we have processed your personal information, you can contact us at gdpr@jtcgroup.com

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated in September 2024.

How to contact us.

If you want to request information about our privacy policy you can contact us at gdpr@jtcgroup.com or Data Privacy Governance Officer, JTC House, 28 Esplanade, St. Helier, Jersey, JE4 2QP