



## **Candidate Privacy Notice**

## Privacy Notice

This notice (Privacy Notice) applies to personal information relating to your application for employment or engagement with HSBC Group held by members of the HSBC Group as data controllers, as described below. It explains what information we collect about you, how we'll use that information, who we'll share it with, the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure. This Privacy Notice covers all aspects of your interaction with HSBC in your capacity as an applicant, including recruitment and pre-employment screening. We may update this notice at any time.

Some of the links on our websites lead to other HSBC or non-HSBC websites with their own privacy notices, which may be different to this notice. So please be aware that this Privacy Notice does not apply when you are using other websites.

Wherever we say 'you' or 'your', this means you or any authorised person who engages with us on your behalf (e.g. recruitment agencies you have authorised to liaise with us on your behalf).

When we say 'we', 'us' or 'our', we mean the HSBC Group companies (as set out in Appendix 1) which act as data controller in respect of your personal data as an applicant or candidate. Unless otherwise stated below, the data controller for the purposes of this Privacy Notice will be the HSBC Group company that operates in the country where you are located or where you have registered to use this site. If you'd like to get in touch with us, you can also find contact details set out in the 'More details about your information' section below.

### What information we collect

We'll only collect your information in line with relevant regulations and law. We may collect it from a range of sources and it may relate to any of the roles you apply for, the role you currently hold or have held in the past, both within and outside of the HSBC Group. We may also collect information about you when you interact with us, e.g. call us, visit our websites or mobile channels, or use services we make available to you in your applicant capacity (e.g. online tests). Some of it will come directly from you, e.g. when you provide ID to verify your identity or right to work. It can also come from your previous employers, other HSBC companies, or other sources you've asked us to obtain information from or you have provided us with the details for. We might also get information from publicly available sources.

The information we collect may include:

#### Information that you provide to us, e.g.:

- Personal details, e.g. name, previous names, gender, date and place of birth, employment history, education, racial/ethnic origin, sexual orientation, and dietary requirements;
- Contact details, e.g. address, email address, landline, and mobile numbers;
- Information concerning your identity e.g. photo ID, passport information, National Insurance number, National ID card, birth number (or equivalent) and nationality;
- Information concerning any qualifications you hold e.g. university education, professional certifications;
- Curriculum vitae or resumes you have provided including any other documents which provide details of your qualifications and work experience;

- Health data including medical condition, health and sickness records or confirmation if you are able to perform a given position (as applicable), information about any disabilities you might have;
- Market research, and information and opinions expressed when participating in applicant surveys;
- Other information about you that you give us by filling in forms or by communicating with us (e.g. interviews or assessments), whether face-to-face, by phone, email, online, or otherwise.

**Information we collect or generate about you, e.g.:**

- Information we use to identify and authenticate you, e.g. your signature, or additional information that we receive from external sources that we need for compliance purposes;
- Geographic information, e.g. about which HSBC offices you visit;
- Cookies and similar technologies we use to recognise you, remember your preferences and tailor the content we provide to you – our cookie policy contains more details about how we use cookies and can be found at [hsbc.co.uk/1/2/cookie-policy](https://www.hsbc.co.uk/1/2/cookie-policy);
- Investigations data, e.g. due diligence checks, fraud, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to exchanges of information between and among individuals and organisations when conducting pre-employment checks including emails, voicemail, live chat;
- Complaints information;
- Application data including information about your individual performance in any assessments or online tests that we ask you to carry out;
- Records of correspondence and other communications between us, including email, live chat, instant messages, and social media communications;
- Information that we need to support our regulatory obligations, e.g. information about transaction details, detection of any suspicious and unusual activity and information about parties connected to you or these activities (e.g., politically exposed person and sanction checks).

**Information we collect from other sources, e.g.:**

- Information you've asked us to collect for you or we collect as part of our vetting process, e.g. work references from previous employers which are treated as confidential;
- Information we collect from publicly available sources such as LinkedIn and other social media.

**How we'll use your information**

We'll only use your information where we have your consent, or we have another lawful reason for using it. These reasons include where we:

- Need to pursue our legitimate interests (e.g., to assess your suitability for the role you are applying for);
- Need to process the information to comply with a legal obligation;
- Believe the use of your information as described is in the public interest (e.g. for the purpose of preventing or detecting crime or for equal opportunity monitoring and/or reporting purposes).

**The reasons we use your information include (but are not limited to):**

- To match you to job vacancies using Artificial Intelligence (AI), to send you job advertisements if you've opted-in to receiving them and information on our vacancies using the methods of communication you have specified, to notify you of decisions and to schedule interviews with you.;
- To contact you about job vacancies and company matters that may be of interest to you;
- To contact you to invite you to assessment days, open days and company events that may be of interest to you;
- To carry out your instructions, e.g. send you details of online tests or assessments;
- To manage our relationship with you, including (unless you tell us otherwise) telling you about our company, opportunities, other roles, services, and events we think may be relevant for you;
- To prevent or detect crime including fraud and financial crime, e.g. financing for terrorism and human trafficking;
- For security, staff vetting and business continuity;
- For risk management; (See Appendix 2 for more information)
- To conduct applicant surveys and data analytics, to better understand our workforce and assist us with succession planning;
- To protect our legal rights and comply with our legal obligations;
- For service, system or product development and planning, insurance, audit and administrative purposes;
- For the purpose of converting a registrant to an applicant, and an applicant to an employee or contractor;
- Assessing your suitability for a role by reviewing your background, qualifications and any other information you have provided to us;

The lawful bases for processing this information is legitimate interest, legal obligation and in order to perform our contract with you.

Further details of how we'll use your information can be found in Appendix 2 below.

**Diversity data**

You may also be invited to supply some diversity information as part of your profile, including but not limited to your age, gender, physical needs, sexual orientation or racial/ethnic origin. This information is optional, and it is your choice to provide it.

We may use your diversity information collected during the application and recruitment process to:

- Assist if you have any special requirements as part of the application and recruitment process or your ongoing employment;
- Identify the demographic backgrounds that exist within our candidate base through the use of anonymised data to ensure the process is inclusive, unbiased and fit for purpose for candidates from a range of demographic backgrounds;
- Suggest future opportunities to you in the form of targeted talent programmes, specific individual job opportunities or wide-ranging initiatives (e.g. bespoke programmes, forums and lectures) to identify talent from particular diversity strands and address particular challenges.

- Access such diversity data linked to your application to communicate with you, where applicable, in line with positive Diversity & Inclusion initiatives that may support your application with the aim of facilitating diversity in the candidate pool and diversity trends analysis.
- Contact you where you have withdrawn from the process to ensure feedback from candidates from a range of diversity backgrounds is captured in relation to the effectiveness of Diversity & Inclusion and other talent acquisition policies and procedures and the ensure relevant support is provided where requested;
- Analyse and assess candidate participation rates from different diversity groups in the same way we analyse gender, age and nationality to determine which candidates we might send additional communications to, to help us implement appropriate measures and take action to improve diversity of our workforce.

If you successfully apply for a role and become an employee of the HSBC Group, any diversity information you provided during the application and recruitment process will be kept and integrated with your employee profile data.

### **How we make decisions about you**

We may use automated systems to help us make decisions about the outcome of your application. We may use technology that helps us identify the level of risk involved if you apply for a job or work for us, e.g. for fraud or financial crime reasons, or to identify market misconduct through analysis of irregular trades.

You may have a right to certain information about how we make these decisions. You may also have a right to request human intervention and to challenge the decision. More details can be found in the 'Your rights' section below.

### **Tracking or recording what you say or do**

We may record details of your interactions with us. We may record and keep track of conversations you have with us including phone calls, face-to-face meetings, letters, emails, live chats, video chats and any other kinds of communication. We may use these recordings to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also use these recordings to make decisions about the outcome of your application. We may capture additional information about these interactions, e.g. telephone numbers that you call us from and information about the devices or software that you use. We use closed circuit television (CCTV) in and around our sites and these may collect photos or videos of you, or record your voice.

### **Vetting**

Should you apply for a job with us, HSBC or a business partner (e.g. Hire Right) will request, collect and process your personal data as part of our vetting procedures which will include criminal convictions checks and credit reference checks. This will be in order to confirm your identity, employment history and relevant qualifications with respect to a role, to comply with the law and for our legitimate interests to be able to assess and manage our risk. Please note we collect personal data directly from candidates through the application and recruitment process and throughout your employment for vetting purposes. This personal data is collected by various teams within HSBC (either based in our offshore Global Service Centres or onshore Security Risk Teams and/or HR Teams). Global vendors or



other carefully selected local third parties in country may also collect personal data, on our behalf, for vetting purposes.

We will typically collect, store, and use the following categories of personal information about you:

- Personal contact details such as name (all legal and alias, current and previous names), title, addresses, telephone numbers, and personal email addresses;
- Date of birth and gender;
- National insurance number or equivalent tax identification number;
- Location of employment or workplace;
- Recruitment information (including copies of right to work documentation, confidential references and other information included in a cv or cover letter or as part of the application process);
- Information concerning any qualifications you hold e.g., university education, professional certifications;
- Employment records (including job titles, work history, working hours, training records and professional memberships).

Vetting checks that we may perform include:

- A right to work check;
- Verification of identity;
- A credit reference check;
- A conduct check, which may include a criminal check (we will only conduct criminal checks where legally permitted or required);
- A conflicts of interest check in relation to the employment of relatives, any former employment with an external auditor and any external directorships held;
- A search of internal HSBC watch lists and external watch lists or database files provided by third parties, indicating no involvement in activities such as fraud, financial crime, money laundering or breach of sanctions;
- A media research check indicating no involvement in activities such as fraud, financial crime, money laundering, breach of sanctions, terrorism.

We will only use your personal information for the purposes for which we collected it, in compliance with GDPR, 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note also that in connection to your application, we may process your personal information without your knowledge or consent, where this is required or permitted by law.

### **Enhanced Vetting**

We may conduct enhanced vetting for specific high-risk roles within HSBC. We will conduct enhanced vetting during recruitment, and periodically throughout your employment, in line with HSBC's vetting policy. If your role is identified as an enhanced vetting role, you will be required to pass a number of checks to the satisfaction of HSBC before or shortly after commencing the role.

During the recruitment process, we will make you aware of any relevant specific vetting requirements for the role you are applying for.

### **Criminal Convictions**

We may request information about criminal convictions if it is appropriate (i.e., for regulated roles) and where we are legally able to do so. We may also collect information about criminal convictions to meet our legal obligations in connection with your employment. We may collect information about criminal convictions in any country where you have resided for a period of 6 months or more within the last five years.

Where required by law, we have in place an appropriate policy and safeguards when processing such data.

### **Credit Reference Checks**

As part of your application to us, we will perform credit and identity checks on you with one or more credit reference agencies (CRAs). We will conduct credit reference checks with CRAs in any country where you have resided for a period of 6 months or more within the last five years.

To do this, we'll supply your personal information to CRAs (see Appendix 2) and they'll give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply us with public information (including the electoral register), shared credit information, financial situation, history and fraud prevention information.

We may use this information to:

- Verify the accuracy of the data you've provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your application(s).

We'll continue to exchange information about you with CRAs while you have a relationship with us. This information may be supplied to other organisations by CRAs. For applicants in the Channel Islands and Isle of Man (CIOM) and the UK, please see Appendix 2 for more details on the CRAs.

### **Service improvement**

We'll analyse your information to identify possible service and improvements in our recruitment process. The lawful basis for processing your information for this purpose is our legitimate interest. We do this to improve our products and services to best meet the needs of our workers.

### **Data analytics**

We'll analyse your information to identify relevant job opportunities and to better manage our workforce. The lawful basis for using your information in this way is our legitimate interest.

### **Protecting our legal rights**

We may need to use your information to protect our legal rights, e.g. in the case of defending or the protection of legal rights and interests (e.g. labour law disputes); court action; managing complaints or disputes; in the event of a restructuring of companies or other mergers or acquisition. This may be in connection with action taken against you or other persons. We'd do this on the basis that it's in our legitimate interest.

## **Compliance with laws and regulatory compliance obligations**

We'll use your information to meet our compliance obligations, to comply with laws and regulations that apply to us and to share with regulators and other authorities that HSBC Group companies are subject to. This may include using it to help detect or prevent crime (including terrorism financing, money laundering and other financial crimes). We'll only do this on the basis that it's needed to comply with a legal obligation or it's in our legitimate interests or that of others.

## **Who we might share your information with**

We may share your information with others where lawful to do so, including where we or they:

- Have a public or legal duty to do so, e.g. to assist with detecting and preventing fraud, tax evasion and financial crime;
- Need to in connection with regulatory, reporting, litigation or asserting or defending legal rights and interests;
- Have a legitimate business reason for doing so, e.g. to manage risk, verify your identity or assess your suitability for roles;
- Have asked you for your permission to share it, and you've agreed.

We may share your information for these purposes with others including:

- Other HSBC Group companies and any sub-contractors, agents or service providers who work for us or provide services to us or other HSBC Group companies (including their employees, sub-contractors, service providers, directors and officers);
- Your intermediaries;
- Tax authorities, trade associations, credit reference agencies;
- Any people or companies where required in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;
- Law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;
- Other parties involved in any disputes, grievances, and investigations;
- Fraud prevention agencies who'll also use it to detect and prevent fraud and other financial crime and to verify your identity;
- Anybody else that we've been instructed to share your information with by you;

## **Sharing aggregated or anonymised information**

We may share aggregated or anonymised information within and outside of the HSBC Group with partners such as research groups, universities, or advertisers. You won't be able to be identified from this information, e.g. we may share information about general employment trends to assist in research.

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

We keep your information in line with our data retention policy. For example, if you are employed by us, we'll normally keep your core data for a period of seven years from the end of our relationship with you or as per the Group or applicable local data retention schedule. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as dealing with any disputes or concerns that may arise. If you have applied for a job with us, and are





unsuccessful, we will retain any personal data collected in line with local regulations or otherwise for a period of two years from the date the candidate is rejected.

We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.

If we no longer have a reason for retaining your data, we may destroy, delete or anonymise it sooner.

### **Transferring your information overseas**

Your information may be transferred to and stored in locations outside the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. In some countries the law might compel us to share certain information, e.g. with tax authorities. Even in these cases, we'll only share your information with people who have the right to see it.

You can obtain more details about the protection given to your information when it's transferred outside the EEA by contacting us using the details in the 'More details about your information' section below.

### **Your rights**

You may have a number of rights in relation to the information that we hold about you. These rights include:

- The right to access information we hold about you and to obtain information about how we process it;
- In some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;
- In some circumstances, the right to receive certain information you have provided to us in an electronic format and / or request that we transmit it to a third party;
- The right to request that we rectify your information if it's inaccurate or incomplete;
- In some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it;
- The right to object to, and to request that we restrict, our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we're entitled to continue processing your information and / or to refuse that request.

You can exercise your rights by contacting us using the details set out in the 'More details about your information' section below. You may also have a right to complain to the data protection regulator in the country where you live or work.

### **What we need from you**

You're responsible for making sure the information you give us is accurate and up to date, and we strongly encourage you to tell us if anything changes as soon as possible.



The absence or inaccuracy of any records may affect the outcome of your application, or we may be prevented from complying with our legal obligations.

#### **How we keep your information secure**

We use a range of measures to keep your information safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

#### **More details about your information**

If you'd like further information on anything we've said in this Privacy Notice or would like to exercise any of your rights as set out in this Privacy Notice, then please contact us via [gdpr.rightsuk@hsbc.com](mailto:gdpr.rightsuk@hsbc.com). Alternatively, you can contact us on +44 3456 024348 (UK only).

## Appendix 1 – List of HSBC Group companies covered by this Privacy Notice

### United Kingdom

- HSBC Asia Holdings B.V.
- HSBC Bank plc UK Ops
- HSBC Global Asset Management Limited
- HSBC Global Asset Management (UK) Limited
- HSBC Global Services (UK) Limited
- HSBC Group Management Services Limited
- HSBC Holdings plc
- HSBC UK Bank plc
- Marks and Spencer Financial Services plc
- HSBC Innovation Bank Limited
- MP Payments Operations Limited

### CIOM

- HSBC Private Bank (Suisse) SA Guernsey Branch
- HSBC Bank plc, Guernsey Branch
- HSBC Securities Services (Guernsey) Limited
- HSBC Management (Guernsey) Limited
- HSBC Bank plc, Isle of Man Branch
- HSBC Trustee (C.I.) Ltd
- HSBC Bank plc, Jersey Branch

## Appendix 2 – How we process your information

We'll use your information for purposes including:

### 1. Application administration purposes, including:

- Carrying out recruitment activities;
- Administering and maintaining personal records;
- Business continuity and emergency management purposes;
- Assessing your performance in interviews, assessments, and on-line tests;
- Evaluating your suitability for the role and making decisions on the outcome of your application;
- The pursuit of complaints;
- Equal opportunities matters including the operation of an equal opportunities policy, identifying, or keeping under review the existence or absence of the quality of opportunity, or treatment between persons of different protected characteristics, with a view to enabling such quality to be promoted, or maintained.

The lawful reasons for processing these are legitimate interest, legal obligation and in order to perform our contract with you.

- ### 2. Prevent and detect crime
- including, e.g. fraud, terrorist financing and money laundering: this will include monitoring, mitigation, and risk management. We do this to comply with our legal obligations and because it's in our legitimate interest.

For candidates applying to UK roles, the personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected, you could be refused certain services or employment. Your personal information will also be used to verify your identity. Further details of how your information will be used by us and Cifas, and your data protection rights, can be found by accessing the following link: [cifas.org.uk/fpn](https://cifas.org.uk/fpn)

We may also share your information with relevant agencies, law enforcement and other third parties where the law allows us to for the purpose of preventing or detecting crime. Additionally, we and other financial institutions may take steps to help prevent financial crime and manage risk. We'll do this because we have a legitimate interest, a legal obligation to prevent or detect crime or it's in the public interest. We may be required to use your information to do this, even if you've asked us to stop using your information. That could include (among other things):

- Passing information to relevant agencies if we think you've given us false or inaccurate information, or we suspect criminal activity;
- Combining the information, we have about you with information from other HSBC Group companies to help us better understand any potential risk.

**3. Risk management:** we'll use your information to measure, detect and prevent the likelihood of financial, reputational, legal, compliance or customer risk. This includes credit risk, traded risk, operational risk and insurance risk (e.g. for underwriting or claims management purposes). We'll do this because we have a legitimate interest in ensuring that we carry out a proper risk assessment prior to making offers of employment;

**4. Online assessments:** we'll use your information to allow us to provide you with access to any online platforms in order for you to carry out any relevant online tests. The platform may allow you to directly or indirectly communicate with us. The lawful basis for using your information for this purpose is in our legitimate interest;

**5. Credit reference checks:** For candidates applying to UK and/or CIOM roles, the identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at:

- Call Credit – [callcredit.co.uk/crain](https://callcredit.co.uk/crain)
- Equifax – [equifax.co.uk/crain](https://equifax.co.uk/crain)
- Experian – [experian.co.uk/crain](https://experian.co.uk/crain)