



## **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/personally identifiable information 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 which is hiring as employer for the relevant role. 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 personal data we collect

We'll only collect your personal data 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 personal data 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;
- Contact details, e.g. address, email address, landline, and mobile/cell numbers;
- Information concerning your identity e.g. photo ID, passport information, Tax number (for Italy), National ID card or equivalent if applicable, date of birth (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;
- Information about any disabilities you might have if you require any special considerations for the recruitment process and only on your request or with your explicit consent.;

- Market research, and we may collect information and opinions expressed when participating in applicant surveys;
- Financial integrity statement if applicable in your country;
- 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.

**Personal data 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 accessed via a link at the bottom of the website;
- Application data including information about your individual performance in any assessments or online tests that we may 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,

**If you are successful candidate, personal data we collect from other sources, e.g.:**

- Investigations data, e.g. due diligence checks, fraud, sanctions and anti-money laundering checks, external intelligence reports;
- Information you've asked us to collect for you, or we collect as part of our vetting process described below in details, as well as 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;

**Why we'll use your information for and the lawful basis for doing so:**

**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 handling of complaints;

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, cyber, 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.

**3. Risk management:** we'll use your information to measure, detect and prevent the likelihood of financial, reputational, legal, compliance risk.

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. **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, video recordings 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. 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. For security reasons, we use closed circuit television (CCTV) in and around our sites and these may collect photos or videos of you. The lawful basis for using your information for this purpose is in our legitimate interest.
6. **Vetting: If you are selected for the role,** HSBC, or a business partner will request, collect and process your personal data/personally identifiable information as part of our vetting procedures which will include for some countries criminal convictions checks, and credit reference checks as permitted by local law. 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. We do this to comply with our legal obligations, and because it's in our legitimate interest.

Please note we collect personal data/personally identifiable information directly from candidates through the application and recruitment process and throughout your employment for vetting purposes. This personal data/personally identifiable information 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/territory may also collect personal data/personally identifiable information, 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;
- Location of current and previous 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 are conducted **only for successful candidates** and may include following aspects:

- A right to work check;
- Verification of identity;
- If applicable a credit reference check where we are legally permitted to do so
- A conduct check, which may include a criminal check (we will only conduct criminal checks where legally permitted or required);
- A conflict 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 applicable local laws, 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, 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.

- 7. Criminal Convictions: If you are selected for the role**, we may request information about criminal convictions if it is appropriate (i.e., for regulated roles) or 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/territory where you have resided for a period of 6 months or more within the last five years (in France, we will keep only the outcome of abovementioned verification).

We do this because we have a legitimate interest in ensuring that we carry out a proper risk assessment prior to making offers of employment.

- 8. Credit Reference Checks (please note that this point and all references to credit checks in this document apply only to : Ireland (For specific roles only), The Netherlands and Sweden. For the rest of countries covered by this Privacy Notice credit checks are not conducted at any stage of hiring): If you are selected for the role**, we will perform credit and identity checks on you with

one or more credit reference agencies (CRAs) where we are legally able to do so. We will conduct credit reference checks with credit reference agencies in any country/territory 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 credit reference agencies, and they'll give us information about you. This will include information from your credit application and about your financial situation and financial history. Credit reference agencies will supply us with public information (including the electoral register, if applicable), 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 credit reference agencies while you have a relationship with us. This information may be supplied to other organisations by credit reference agencies.

- 9. Service improvement:** We'll analyse your information to identify possible service and improvements in our recruitment process. For that purpose, personal data will be minimized to what is strictly necessary.

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.

- 10. Data analytics:** We'll analyse your information to identify relevant job opportunities and to better manage our workforce, only with your prior consent. 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 to schedule interviews with you and manage any complaints you may have.

The lawful basis for using your information in this way is your consent.

- 11. 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.

- 12. 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.

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.

### How we make decisions about you

We may use automated systems (including AI) 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.

You will receive dedicated information about how we make these decisions.

Where we use automated decision making, you will be informed and you also have a right to request human intervention and to challenge the decision. More details can be found in the 'Your rights' section below.

### 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,
- 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);
- HSBC recruiters from HSBC group companies and third-party human resource consultants and service providers (and their sub-contractors)
- Your intermediaries;
- 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, lawyers, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations, litigation or audits of our activities;
- Other parties involved in any disputes, grievances, and investigations;
- Anybody else that we've been instructed to share your information with by you.

### How long we'll keep your information

We keep your information in line with local data retention policy. 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/personally identifiable information collected in line with local regulations or otherwise according to below table highlighted as Appendix 3

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, responding to requests from regulators, etc.

If you decide to withdraw your consent or 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 country/territory in which you are located, including countries/territories 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, including obtaining authorisation from the relevant Data Protection Authority/Regulator if required. 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. 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 to another jurisdiction by contacting us using the details in the 'More details about your information' section below.

### Your rights and how to exercise them

You have rights under GDPR (General Data Protection Regulation) in relation to the information that we hold about you.

- The right to access information we hold about you and to obtain copy of this information in a readable format and how we process it;
- 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 a legal obligation for doing so;
- In some circumstances, the right to request to transmit your information 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 under applicable laws;
- 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 if permitted under the applicable laws.

You can exercise your rights by contacting us using the details depending on where you are applying or where you are living as set out in Appendix 1 or sending an email to HSBC Continental Europe Data Protection Officer : [dataprotection@hsbc.fr](mailto:dataprotection@hsbc.fr) . You may also have a right to file a complaint with the data protection regulator/supervisory authority in the country/territory where you live or work as detailed in Appendix 2.

### 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 see the relevant contact list in Appendix 1.

**Appendix 1 – Legal Entities, DPO and Rights of Individuals Contact details.**

Below is a list of legal entities covered by this Privacy Notice and the respective Data Protection office and Rights of Individual contacts for these countries/territories:

Country	Legal Entity	DPO Contact	Rights of individual Contact
Belgium	HSBC Continental Europe, Belgium	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:bedataprivacy@hsbc.com">bedataprivacy@hsbc.com</a>
Czech Republic	HSBC Continental Europe, Czech Republic	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:svetlana.kratochvilova@hsbc.com">svetlana.kratochvilova@hsbc.com</a> <a href="mailto:marketa.vyhnavkova@hsbc.com">marketa.vyhnavkova@hsbc.com</a>
France	HSBC Continental Europe	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	SIRH France
	HSBC Global Asset Management FCP		
	HSBC Global Services (UK) Paris Branch		
	HSBC Private Bank (Luxembourg) SA		
Ireland	HSBC Continental Europe	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:hrdataprivacy@hsbc.com">hrdataprivacy@hsbc.com</a>
	HSBC Security Service (Ireland) DAC		
	HSBC Investment Funds (Luxembourg) S.A., Ireland Branch		
Italy	HSBC Continental Europe, Italy	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:hrdataprivacy@hsbc.com">hrdataprivacy@hsbc.com</a>
Luxembourg	HSBC Continental Europe, Luxembourg	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:lux.data.privacy@hsbc.com">lux.data.privacy@hsbc.com</a>
	HSBC Investment Funds (Luxembourg) SA		
	HSBC Private Bank (Luxembourg) S.A.		
Netherlands	HSBC Continental Europe, The Netherlands	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:nldataprivacy@hsbc.com">nldataprivacy@hsbc.com</a>
	HBEU Netherlands Branch		
Poland	HSBC Continental Europe (Spółka Akcyjna) Oddział w Polsce	<a href="mailto:dpo_poland@hsbc.com">dpo_poland@hsbc.com</a>	<a href="mailto:recruitment_rodobank@hsbc.com">recruitment_rodobank@hsbc.com</a>
	HSBC Service Delivery (Poland) Sp. z o	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:rodokrakow@hsbc.com">rodokrakow@hsbc.com</a>
Spain	HSBC Continental Europe, Sucursal en España	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:gdpr.customer.service@hsbc.com">gdpr.customer.service@hsbc.com</a>
Sweden	HSBC Continental Europe Bank, Sweden Filial	<a href="mailto:dataprotection@hsbc.fr">dataprotection@hsbc.fr</a>	<a href="mailto:hrdataprivacy@hsbc.com">hrdataprivacy@hsbc.com</a>

**Appendix 2 – Local Data Protection Authority Contact details**

Below is a list of local Data Protection Authority contact details for the countries/territories covered by this Privacy Notice:

<b>Countries</b>	<b>Data Protection Authority</b>	<b>Contact Details</b>
Belgium	Autorité de la protection des données - Gegevensbeschermingsautoriteit (APD-GB)	Rue de la Presse 35 – Drukpersstraat 35 1000 Bruxelles - Brussel Tel. +32 2 274 48 00 Email: <a href="mailto:contact@apd-gba.be">contact@apd-gba.be</a> Website: <a href="https://www.autoriteprotectiondonnees.be">https://www.autoriteprotectiondonnees.be</a> <a href="https://www.gegevensbeschermingsautoriteit.be">https://www.gegevensbeschermingsautoriteit.be</a>
Czech Republic	Office for Personal Data Protection	Office for Personal Data Protection Pplk. Sochora 27, 170 00 Prague 7 Tel. +420 234 665 111 Email: <a href="mailto:posta@uouu.cz">posta@uouu.cz</a> Website: <a href="http://www.uouu.cz/">http://www.uouu.cz/</a>
France	Commission Nationale de l'Informatique et des Libertés (CNIL)	3 place de Fontenoy, TSA 80175 75334 Paris Cedex 07 Tel : +33 (0)1 53 73 22 22
Ireland	Data Protection Commission (DPC)	21 Fitzwilliam Square D02 RD28 Dublin 2 Tel. +353 76 110 4800 Email: <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a> Website: <a href="http://www.dataprotection.ie/">http://www.dataprotection.ie/</a>
Italy	The Italian Data Protection Authority (Garante per la protezione dei dati personali)	Piazza Venezia 11 00187 - Rome (Italy) Tel: +39 06.696771 Email: <a href="mailto:protocollo@gpdp.it">protocollo@gpdp.it</a>
Luxembourg	Commission Nationale pour la Protection des Données (CNPd)	15, Boulevard du Jazz L-4370 Belvaux Tel. +352 2610 60 1 Email: <a href="mailto:info@cnpd.lu">info@cnpd.lu</a> Website: <a href="http://www.cnpd.lu/">http://www.cnpd.lu/</a>
Netherlands	Autoriteit Persoonsgegevens	Hoge Nieuwstraat 8 P.O. Box 93374 2509 AJ Den Haag/The Hague Tel. +31 70 888 8500 Website: <a href="https://autoriteitpersoonsgegevens.nl/">https://autoriteitpersoonsgegevens.nl/</a>
Poland	Urząd Ochrony Danych Osobowych (UODO)	Stawki 2 00-193 Warsaw Poland Email: <a href="mailto:kancelaria@uodo.gov.pl">kancelaria@uodo.gov.pl</a> Tel. +48 22 531 03 00 Fax +48 22 243 05 69 Helpline (in Polish only): phone no. +48 606-950-000 Website: <a href="https://uodo.gov.pl/en/p/contact">https://uodo.gov.pl/en/p/contact</a>

Countries	Data Protection Authority	Contact Details
Spain	Agencia Española de Protección de Datos (AEPD)	C/Jorge Juan, 6 28001 Madrid Tel. +34 91 266 3517 Fax +34 91 455 5699 Email: <a href="mailto:internacional@aepd.es">internacional@aepd.es</a> Website: <a href="https://www.aepd.es/">https://www.aepd.es/</a>
Sweden	Integritetsskyddsmyndigheten	Drottninggatan 29 5th Floor Box 8114 104 20 Stockholm Tel. +46 8 657 6100 Fax +46 8 652 8652 Email: <a href="mailto:imy@imy.se">imy@imy.se</a> Website: <a href="http://www.imy.se/">http://www.imy.se/</a>

**Appendix 3 – Local Data Retention Period for candidates’ data:**

Countries	Entities	Applicable retention period		
		Rejected Candidates application data	Successful Candidates	Candidate account
Belgium	HSBC Continental Europe, Belgium	2 years	10 years	If Candidate account/profile is not active, profiles will be purged at 2-year point.
Czech Republic	HSBC Continental Europe, Czech Republic	1 years	10 years	
France	HSBC Continental Europe	2 years	5 years	
	HSBC Global Asset Management FCP			
	HSBC Global Services (UK) Paris Branch			
	HSBC Private Bank (Luxembourg) SA			
Ireland	HSBC Continental Europe	2 years	7 years	
	HSBC Security Service (Ireland) DAC			
	HSBC Investment Funds (Luxembourg) S.A., Ireland Branch			
Italy	HSBC Continental Europe Italy	2 years	5 years	
Luxembourg	HSBC Continental Europe, Luxembourg	2 years	7 years	
	HSBC Investment Funds (Luxembourg) SA			
	HSBC Private Bank (Luxembourg) S.A.			
Netherlands	HSBC Continental Europe, The Netherlands	2 years	7 years	
	HBEU Netherlands Branch			
Poland	HSBC Continental Europe (Spółka Akcyjna) Oddział w Polsce	1 year	7 years	
	HSBC Service Delivery (Poland) Sp. z o.			
Spain	HSBC Continental Europe, Sucursal en España	1 year	7 years	
Sweden	HSBC Continental Europe Bank, Sweden Filial	2 years	7 years	