

**Zaoui & Co Ltd**  
**(the “Firm”)**

**GDPR CANDIDATE PRIVACY NOTICE**

**INTRODUCTION**

The Firm is a “**data controller**” for the purposes of the General Data Protection Regulation ((EU) 2016/679) (the “**GDPR**”). This means that the Firm is responsible for deciding how it holds and uses personal information about you.

You are being sent a copy of this privacy notice because you are applying for work with the Firm. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It also provides you with certain information that must be provided under the GDPR including the legal basis for processing your personal information as part of your application for employment.

**Legal basis for collecting your information**

The Firm is able to legally collect and use your personal information because collecting and using your personal information is necessary for the Firm to:

- comply with a legal obligation to which the Firm is subject, including any legal obligations under employment law;
- perform any contractual obligations as a prospective employer and/or engager of personnel in contracts to which you may be a party or in order to take steps at the request of any data subject prior to entering into a contract; and/or
- carry out the Firm’s legitimate business interests in conducting its business advising clients on financial transactions and major investment decisions with you as a prospective employee, contractor or other personnel of the business. This legitimate interest includes but is not limited to recruitment, administration, advertising and marketing.

**DATA PROTECTION PRINCIPLES**

The Firm will comply with data protection law and principles, which means that your personal data will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that the Firm has clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes the Firm has told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes the Firm has told you about; and
- kept securely.

**THE KIND OF INFORMATION The firm HOLDS ABOUT YOU**

In connection with your application, the Firm will collect, store, and use the following categories of personal

information about you:

- the information you have provided to the Firm in your CV and covering e-mail or letter;
- the information you have provided on any application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- any information you provide to the Firm during an interview;
- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; and
- information about your health, including any medical condition, health and sickness records.

#### **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

The Firm collects personal information about candidates from the following sources:

- you, the candidate;
- recruitment agencies;
- your named referees, from whom the Firm collects the following categories of data.

#### **HOW the Firm WILL USE INFORMATION ABOUT YOU**

The Firm will use the personal information it collects about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to the Firm's hiring processes; and
- comply with legal or regulatory requirements.

#### **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for the Firm to consider your application (such as evidence of qualifications or work history), the Firm will not be able to process your application successfully. For example, if the Firm requires references for this role and you fail to provide relevant details, the Firm will not be able to take your application further.

#### **HOW the Firm USES PARTICULARLY SENSITIVE PERSONAL INFORMATION**

The Firm may use your particularly sensitive personal information about any disability or health condition you may have to consider whether it needs to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

The Firm has in place an appropriate policy document and safeguards which it is required by law to maintain when processing such data.

#### **AUTOMATED DECISION-MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated

decision-making.

## **DATA SHARING**

The Firm will only share your personal information with the following the Coaching Assembly who are a service provider administering our recruitment web portal for the purposes of processing your application. All the Firm's third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with the Firm's policies. The Firm does not allow its third-party service providers to use your personal data for their own purposes. The Firm only permits them to process your personal data for specified purposes and in accordance with its instructions.

## **DATA SECURITY**

The Firm has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, the Firm limits access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on the Firm's instructions and they are subject to a duty of confidentiality.

The Firm has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where it is legally required to do so.

## **DATA RETENTION**

The Firm will usually retain your personal information for a period of 6 months after it has communicated to you its decision about whether to appoint you to a role. The Firm may retain your personal information for a longer period in case there are further job opportunities in the near future or so that the Firm can show, in the event of a legal claim, that it has not discriminated against candidates on prohibited grounds and that the Firm has conducted the recruitment exercise in a fair and transparent way. After this period, the Firm will securely destroy your personal information in accordance with applicable laws and regulations.

The Firm encourages all job applicants to use the link on our website which will direct you to the Coaching Assembly webportal. The application generates an automatic reply which attaches this Candidate Privacy Notice, explaining how and why the Firm uses a candidate's personal data, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. Any CV's or applications which are sent to any other Zaoui e-mail address (including [contact@zaouico.com](mailto:contact@zaouico.com) will be deleted).

## **your rights in connection with personal information**

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

- **request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information the Firm holds about you and to check that the Firm is lawfully processing it;
- request **correction** of the personal information that the Firm holds about you. This enables you to have any incomplete or inaccurate information the Firm holds about you corrected;
- request **erasure** of your personal information. This enables you to ask the Firm to delete or remove personal information where there is no good reason for the Firm continuing to process it. You also have the right to ask the Firm to delete or remove your personal information where you have exercised your right to object to processing (see below);
- **object to processing** of your personal information where the Firm is relying on a legitimate interest (or

those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where the Firm is processing your personal information for direct marketing purposes;

- **request the restriction of processing** of your personal information. This enables you to ask the Firm to suspend the processing of personal information about you, for example if you want the Firm to establish its accuracy or the reason for processing it;
- request **the transfer** of your personal information to another party; and
- if you want to **review, verify, correct or request erasure** of your personal information, object to the processing of your personal data, or request that the Firm transfers a copy of your personal information to another party, please contact [dataprotection@zaouico.com](mailto:dataprotection@zaouico.com) in writing.

#### **RIGHT TO WITHDRAW CONSENT**

When you applied for this role, you may have provided consent to the Firm processing special categories of your personal information for the purposes of the recruitment exercise such as medical information relating to a disability. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact [dataprotection@zaouico.com](mailto:dataprotection@zaouico.com). Once the Firm has received notification that you have withdrawn your consent, the Firm will no longer process your application and, subject to the Firm's retention policy, the Firm will dispose of your personal data securely.

#### **DATA PROTECTION OFFICER**

The Firm has appointed a data protection manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how the Firm handles your personal information, please contact the [dataprotection@zaouico.com](mailto:dataprotection@zaouico.com). You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues.