

Job Applicants

GLMX Europe Limited (“GLMX”, “us”, “we” or “the Firm”), registered with the ICO under number ZA571316, as a Data Controller, have an obligation under applicable Data Privacy Regulations to inform individual Data Subjects of their rights in relation to data held about them.

(i) What information is being collected

For the purposes mentioned in the following paragraph “Why it is being collected” we collect and may process the following personal data:

- Name
- Contact details (telephone number, email address and postal address)
- Curriculum Vitae/Resumé
- Current and previous employment details
- Education background (university or school diplomas/certificates and other educational achievements)
- Languages spoken and level of proficiency
- Job preferences including willingness to travel and/or relocate
- Gender
- Marital Status
- Evidence of identity (copy of National ID/Passport)
- Immigration status and work permits including employment pass/work authorisations or others relevant documents
- Photographic images submitted

Where relevant to the recruitment process, including where necessary to accommodate any disability needs or to comply with some regulatory requirements, we may also have the need to process some Special Categories of Data (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or a natural person’s sex life or sexual orientation). Special Categories of Data processed may include:

- Criminal records

(ii) Why it is being collected

All the data you provide to us will be processed subject to the restrictions and for the purposes pointed out in this notice, namely:

- a. to process your application including identify and contact you (legal basis for processing as per lawfulness condition is your consent)
- b. to determine whether you have the professional skills, expertise and experience for the position applied for (legal basis for processing as per lawfulness condition is your consent)
- c. if you are offered a position with us, to verify the personal data provided including your identity, address, right to work, employment history and academic background and other background screening purposes including, where allowed by law, criminal record checks, searches with a credit reference agency and sanctions screening checks (legal basis for processing as per lawfulness condition is your consent)

The provision of data is necessary for starting the recruiting process and a lack of data will be an impediment to it. You have the right to withdraw your consent at any time, without affecting the lawful processing of data based on consent up to the point of its withdrawal.

(iii) Who is collecting data

Data will be collected by GLMX (the “Data Controller”), with business address 4 Crown Place, London, EC2A 4BT, United Kingdom.

(iv) How data is collected and processed

We collect Personal Data in the following ways:

We collect your Personal Data when you submit a job application via email.

We will not collect your photographs or videos from any Social Network Site unless you submit a photograph or video voluntarily as part of your recruitment application.

Recruitment Agencies

Your Personal Data may be provided to us by recruitment agencies with whom you have registered when you confirm that are interested in pursuing a role with us. Where a recruitment agency refers you to us, a profile will be created for you in our recruitment database based on the information provided.

Other sources

Whilst in most cases we will collect Personal Data personally supplied by you, Personal Data may also be collected about you from third parties during the recruitment process such as references from previous employers.

Personal data is processed both manually and electronically in accordance with the abovementioned purposes and, in any case, in order to guarantee data security and data confidentiality in compliance with current regulations. Access to Personal Data will be given only to those who need such access for the purposes listed above or where required by law. These parties may include human resources personnel, information technology personnel, relevant business managers, and authorised representatives of internal control functions, such as Audit and Compliance.

Your data may also be provided to such companies’ agents, contractors, and third-party service providers when necessary for the performance of their contract with such companies. Third Party processors may include Global Liquid Markets, LLC and its affiliates, Kroll, and Global HR Research. Our Employees and Third Party processors are appropriately designated and trained to process data only according to the instructions we provide them or as required by law. Only the exact data required to fulfill each processing purpose (whether internal or external), is made available to the necessary individuals.

(v) How data is stored and with whom it could be shared

Data is recorded on paper and IT systems. Basic personal data including CVs will be stored on our Internal HR Directory which is accessible to HR personnel for the above-mentioned purposes.

Data may reside on shared IT systems with one of our group companies, who will be able to access the data for the above-mentioned purposes.

Your Data will be subject to cross-border transfers to the USA as permitted under standard data protection clauses. As mentioned in (iv) we may disclose your Personal Data with authorised service providers and government bodies for the purpose of complying with legal obligations, meeting contractual employer obligations and providing additional optional benefits. These may include criminal record bureau, credit reference agency (when conducting background checks) and professional advisers. Our contracts with our service providers include commitments that they agree

to limit their use of Personal Data to our specific instructions and to comply with privacy and security standards.

When we share your information with other entities within our group or contracted Third Party companies we take all reasonable steps to ensure that your information and privacy are protected in line with the applicable legal obligations.

If your application for employment is unsuccessful, your data will be stored for a period of 6 months for the purpose of having adequate records. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed. Should you apply for a job with us in the future or if, with your consent, we wish to contact you about a future opportunity to work with us and your data will be stored for a further six months or until you withdraw your consent if earlier. Further, your personal information will be retained for that period so that we can show, in the event of any legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment.

(v) Your rights and how to exercise them

We remind you that you have the right to request from us access to and rectification or erasure of personal data, or a restriction of processing, or to object to processing of data concerning you.

You also have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from us. In exercising your right to data portability, you have the right to have your personal data transmitted directly from a controller to another, where technically feasible.

You can contact us to exercise your rights with the contact details indicated above in (iii) or sending an email to privacy@glmx.com

If you consider that the processing of your personal data infringes applicable data protection laws, as data subject you have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority, in particular, in the Member State of your habitual residence, place of work or place of the alleged infringement.