

# UK Data Privacy Notice

## Candidate Registration Privacy Notice

### **Before we begin**

This notice (Privacy Notice) applies to personal information supplied at [mycareer.hsbc.com/talentcommunity](https://mycareer.hsbc.com/talentcommunity) site. This information will be held by HSBC Group and 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 a registrant.

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. You'll need to make sure you're happy with their privacy notices when using those other sites.

Wherever we've said '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', we mean HSBC Group companies (as set out in Appendix 1) which act as a data controller in respect of your personal data in your applicant capacity. Unless otherwise stated below, the data controller for the purposes of this 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 may apply for, 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.

Most of it will come directly from you because you have volunteered to provide that information to us. 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 of. We might also get some of it 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 and education;
- ◆ 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;
- ◆ Market research, and information and opinions expressed when participating in surveys;
- ◆ Other information about you that you give us by filling in forms or by communicating with us, 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;
- ◆ 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 the bottom of this page;
- ◆ Investigations data, e.g. due diligence checks, fraud, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to relevant exchanges of information between and among individuals, organisations, including emails, voicemail, live chat;

- ◆ Application data including information about your individual performance in assessments or online tests that you might carry out if you attend an open day or assessment day;
- ◆ Records of correspondence and other communications between us, including email, live chat, instant messages and social media communications.

#### **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.

#### **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:

- ◆ To match you to job vacancies, to send you job advertisements 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 using your contact details 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 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, risk management and business continuity;
- ◆ To conduct 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;
- ◆ Assessing your suitability for a role by reviewing your background, qualifications and any other information you have provided to us;
- ◆ The pursuit of complaints;

- ◆ Equal opportunities monitoring 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.

#### **Diversity data**

You may also be invited to supply some diversity information as part of your profile, including but not limited to your age range, gender, physical needs, sexual orientation or racial/ethnic origin which is your choice to provide if you wish. This information, if you decide to provide it, will be used only for reporting on the diversity of our candidate base across the organization, or to assist if you have any special requirements as part of the recruitment process or your ongoing employment.

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

We may use automated systems to help us make decisions about you. 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 you. 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, we 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 for vetting through the application and recruitment process and throughout your employment directly from candidates by 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 for vetting purposes for us.

We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

If you apply for a job with us, we will provide you with full details of all vetting checks that we will carry out on you and the reasons why we carry out such checks.

### **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.

### **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 need 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 other laws and regulations 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 and 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. Your information will be retained by us for a period of 12 months from the date you provide it to us in line with local regulations after which time it will automatically be deleted from our systems. You can choose to keep your information in our systems for successive 12 month periods thereafter where you agree to this by replying to our email request to retain your information on our systems. If you do not reply to our email request, your information will automatically be deleted from our systems and you will have to register with us again.

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 don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

### **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 of 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 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;
- ◆ The right to request that we erase your information. You can do this at any time by contacting us and we will arrange to 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 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 [hrprospects.rights@hsbc.com](mailto:hrprospects.rights@hsbc.com).

## Appendix 1 – HSBC Legal Entities

Armenia	HSBC Bank Armenia cjsc	Malta	HSBC Global Services (UK) Limited – Malta Branch
Belgium	HSBC France, Brussels Branch	Monaco	HSBC Private Bank (Monaco) SA
Bermuda	HSBC Bank Bermuda Limited	Netherlands	HSBC France, Amsterdam Branch
Cayman Islands	HSBC Cayman Services Limited	Netherlands	HSBC Asia Holdings B.V.
Czech Republic	HSBC France – pobočka Praha	Poland	HSBC Service Delivery (Polska) Sp. z o.o.
France	HSBC Global Services (UK) Paris Branch	Russian Federation	HSBC Bank (RR) (Limited Liability Company)
France	HSBC Assurances Vie (France)	Spain	HSBC France, Sucursal en España
France	HSBC France	South Africa	HSBC Securities (South Africa) (Pty) Limited
France	HSBC Global Asset Management (France)	Switzerland	HSBC Global Asset Management (Switzerland) AG
Germany	HSBC Global Asset Management (Deutschland) GmbH	Switzerland	HSBC PB Services (Suisse) SA
Germany	HSBC Transaction Services GmbH	Switzerland	HSBC Private Bank (Suisse) SA
Germany	HSBC Trinkaus & Burkhardt AG	Switzerland	HSBC Private Banking Holdings (Suisse) SA
Germany	HSBC Trinkaus Real Estate GmbH	Switzerland	HSBC Trust Company AG
Germany	INKA Internationale Kapitalanlagegesellschaft mbH	UK	Marks And Spencer Financial Services plc
Greece	HSBC France, Athens Branch	UK	HSBC Global Asset Management (UK) Limited
Guernsey	HSBC Bank plc, Guernsey Branch	UK	HSBC Global Asset Management Limited
Guernsey	HSBC Management (Guernsey) Limited	UK	HSBC Global Services (UK) Limited
Guernsey	HSBC Securities Services (Guernsey) Limited	UK	HSBC Global Services Limited
Guernsey	HSBC Trustee (Guernsey) Limited	UK	HSBC Group Management Services Limited
Ireland	HSBC France, Dublin Branch	UK	HSBC Private Bank (UK) Limited
Isle of Man	HSBC Bank plc, Isle of Man Branch	UK	HSBC Securities (Japan) Limited
Italy	HSBC France, Milan Branch	UK	HSBC UK Bank plc
Jersey	HSBC Bank plc, Jersey Branch	UK	Marks and Spencer Financial Services plc
Jersey	HSBC Global Asset Management (International) Limited	UK	HSBC Management (Guernsey) Limited
Jersey	HSBC Trustee (C.I.) Limited	UK	HSBC Securities Services (Guernsey) Limited
Luxembourg	HSBC France, Luxembourg Branch	UK	HSBC Trustee (Guernsey) Limited
Luxembourg	HSBC Investment Funds (Luxembourg) SA	UK	HSBC Holdings B.V. (UK Branch)
Luxembourg	HSBC Private Bank (Luxembourg) S.A.		
Luxembourg	HSBC Securities Services (Luxembourg) S.A.		
Malta	HSBC Bank Malta p.l.c.		

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