

# INFORMATION ABOUT THE PRIVACY OF YOUR DATA

## Privacy Notice

For job applicants and candidates

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THE THOUGHTFUL INVESTOR

## WHO ARE WE?

Castlefield is a family of investment and advisory businesses comprising of Castlefield Investment Partners LLP, Castlefield Advisory Partners Ltd and the authorised corporate director ConBrio Fund Partners Ltd. Our group holding company is Castlefield Partners Limited. In this document 'Castlefield' is used to refer to our whole group of companies.

For the purposes of data protection regulation, we are a 'data controller'. This means that we have responsibility for the data that we collect and we must exercise control over its processing in the course of our work. We must determine the purposes for our collecting your personal data in the first place and then monitor the way in which we process it, to make sure that we meet strict data protection regulations.

## WHAT IS THIS NOTICE ABOUT?

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On 25<sup>th</sup> May 2018 the General Data Protection Regulation (GDPR) came into force in the UK and across Europe. Having been brought into UK law, the aim of the UK GDPR is to reshape and enhance the way that all organisations approach data privacy, making them more accountable for the way that they process and manage personal data and giving greater rights of protection to data subjects.

This notice will show you what we have done and will continue to do at Castlefield to meet the requirements of UK GDPR. It'll explain what data we collect about job applicants and candidates, what we use it for and how we use it.

## WHAT DO WE MEAN BY INFORMATION?

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This notice will refer to 'personal data'. This means any information that can be used to identify a living individual and that can be used to distinguish between individuals. It can apply to data that is already in the public domain or restricted personal data that you disclose to us.

In addition, there are extra regulations around 'sensitive personal data'. This encompasses the racial or ethnic origin of an individual, political opinions, religious or philosophical beliefs, membership of a trade union, details of their physical or mental health or condition, sexual preferences, the commission or alleged commission by them of any offence, biometric data where processed to uniquely identify a person (for example a photo in an electronic passport).

This is data of a more personal nature and we would not ask for it or indeed require to have it before any job offer is made to you, although if you apply through an agency you might separately have been asked to supply some of this information to them.

## HOW DO WE COLLECT YOUR INFORMATION?

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During the application process we'll obtain and record your contact details, including your name, contact telephone number, address, and email address. If you send your application to us directly, by email, in the post or by completing our online application form, we would obtain your details in that way. You may have called us and expressed an interest in Castlefield. In this case it's likely you would have left your contact details with us so we can return the call and speak to you further about a job opportunity.

If you applied to us via a recruitment agent, university, job board or another third party, we would receive your details from them. You would have been required to give that third-party permission to share your details with us.

If you're ever unsure when providing information to us, our People and Training team will be happy to explain more about why we're asking and how we'll use your data.

If Castlefield's services have been recommended to you by a third party, for example an external financial advice or investment firm, we may have received your information indirectly after you've given that party permission to share it with us.



## WHY DO WE COLLECT YOUR INFORMATION AND HOW DO WE USE IT?

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In a nutshell, we'll use your information to carry out the duties that we need to as part of the recruitment and selection process.

**Here are some examples of the types of information we might collect, what we do with it and the legal reasons we have for processing it:**

- Your name, address and contact details are used to get in touch with you. When you apply directly we'll acknowledge your application by replying to your email. Typically, the next step would be to call you and talk over the phone if you included your number in your application. We'll keep your contact details on file during the application process, which it is in both yours and our legitimate interest to do so

- If you're applying via a recruitment agent we wouldn't normally have access to your address or phone number until we're in position to make an offer of employment. On some occasions we'll request your phone number from the recruiter so we can talk about details of the job directly with you. You'd need to give the agent consent to share your data with us

- We collect information to confirm your identity. Specifically, we'll ask for proof of identity documentation, such as your passport, birth certificate or recent utility bills. We need this information to meet the legal obligations set out for us by Home Office, to prevent illegal working in the UK.

We have regulatory obligations to ensure we apply fit and proper testing to all our prospective candidates. Those checks will differ depending on what role you've applied for. We'd inform you about these during the selection process and specify which tests apply to you. Generally, these include checks of honesty (including openness with self-disclosures, integrity and reputation), competence, capability and financial soundness. In order to perform such tests we'll collect information from you about your qualifications, educational attainments, references and we will also use third party vetting services to perform credit checks and DBS checks (only relevant roles)

- If you are asked to attend one of our Open Days or interview as part of the selection process we may take notes in the form of observation sheets, interview notes and other annotations during the interviews or group assessments, are important when making decision on the progress of the application. We'll collect those so we can make the right decision about your application, which is in our legitimate interest as a business

## WHO MIGHT WE SHARE YOUR INFORMATION WITH?



We won't sell or pass your data on to any third parties outside of our group of companies for marketing or research purposes.

On occasion we might need to share your information with third parties outside of Castlefield who we use to carry out certain activities. This is usually either to allow us to arrange or provide a service and fulfil our contract with you, or because of a regulatory or legal requirement.

### Here are some of the times we might currently share your data and why:

- To conduct identity verification checks, credit checks, sanction searches and DBS checks (where appropriate), we use third party agencies, currently provided by The Professional Office Limited and Know Your Candidate. It is a legal requirement that we complete these checks, as it is for any other regulated financial services company.
- We are legally obliged to share information, on request, with our regulatory and supervisory authorities, including the Financial Conduct Authority (FCA), the Information Commissioner's Office (ICO) and the Financial Ombudsman Service (FOS).
- In some instances, we may be required to share information with law enforcement agencies in the detection and prevention of crime. This would happen where there is a legal requirement or if it were in the public interest.

We conduct due diligence on the parties who we choose to work with, including amongst many things, checking to ensure that they have sufficiently robust data protection policies and procedures in place of their own.

## **WHAT DO WE DO TO PROTECT THE SECURITY OF YOUR INFORMATION? WHO HAS ACCESS TO MY DATA?**

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Data protection is at the centre of our operational culture here at Castlefield. All employees undergo regular Data Protection training and sign annual declarations to say that they'll adhere to the strict codes of practice required of them.

We use the services of a local, UK based IT firm, 'Ashmore IT', and UK Fast, who carry out regular testing to ensure our software systems and servers are protected by rigorous e-safety measures, such as using data encryption, firewalls and password protection.

Most of our employees are based at our office in Manchester, which is our headquarters. We mainly store your data electronically on our servers in a secure UK data centre. Your data is saved in files to which only the Head of Client Services, Head of Finance and People and Training team have access to.

If you are shortlisted for interview we'll share your CV with the recruiting team, who would likely include the recruiting manager and a selection team.

Access to your personal data is strictly controlled so only selected Castlefield employees can use it. When we receive or use your data in a physical format we have strict procedures surrounding this too. For example, we operate a clear desk policy, whereby all physical documents are locked securely away when we're not using them, and are shredded when no longer required.

## **HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?**

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We'll retain information relating to your application for up to six months from the end of the selection stage (after last interview or Open Day). After that we'll delete details of your application from our system.

It's important for us that we keep in touch with those candidates who have particularly impressive experience and whose values are aligned to those of Castlefield. On such occasions, after informing you that your initial application has been unsuccessful we might ask you for permission to add your details to our Talent Bank. Our Talent Bank contains details including CVs, contact details and names of prospective candidates who've expressed an interest in Castlefield in the past, but have not progressed through the whole selection process.

## **THE RIGHTS OF ACCESS THAT YOU HAVE TO YOUR DATA**

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**You have the right to request a copy of the information that we hold about you.**

Please email us at [careers@castlefield.com](mailto:careers@castlefield.com) or write to:

### **PARTNER, PEOPLE AND TRAINING**

Castlefield Partners Limited  
111 Piccadilly  
Manchester  
M1 2HY

You can also find out more about the rights you have as a data subject in the UK from the Information Commissioner's Office's own website: [www.ICO.org.uk](http://www.ICO.org.uk)



## ABOUT THIS PRIVACY NOTICE

Please contact us if you have any further questions about this privacy notice.

In line with our ongoing commitment to data protection we keep our privacy policy under regular review.

This policy will be published on our website in the careers site, where any changes will also be kept up to date. The most recent version of this policy was published in June 2021.





THE THOUGHTFUL INVESTOR

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