

Veritas Asset Management LLP

Candidate Privacy Notice

This privacy notice applies if you are applying for employment with Veritas Asset Management LLP, either directly or via a third party Recruitment Company.

Veritas Asset Management LLP (hereinafter referred to as “VAM”, “we”, “us” or “our”) is committed to protecting the privacy and security of your personal information and ensuring that we comply with our data protection obligations as data controller under the General Data Protection Regulations (“GDPR”) and other applicable data protection laws, including without limitation, The Data Protection Act 2018. The purpose of this notice is to explain what personal data VAM collects and how VAM uses it. Please take the time to read and understand this privacy notice.

Where we use the term your “Application” in this notice, we are referring to your application to work at VAM whether submitted speculatively or in response to a specific role.

Personal data collected by Veritas Asset Management LLP

VAM will collect and process (e.g. obtain, record, use, share or hold etc.) the following personal data about you:

Information that you provide to us

This includes information that you submit to us when you make your initial application and includes:

- personal details such as, but not limited to, your full name, email address, contact details, employment history and qualifications (both academic and professional); and
- any other details you provide in support of your Application, including (but not limited to) information contained in your CV and/or covering email, your reasons for applying and any case studies or assessment materials you submit.

Information we collect during the assessment and recruitment process

This includes information that is collected in connection within any recruitment process and is likely to include:

- personal data that we collect through your communication and correspondence with us (including but not limited to the content, date and time of your email correspondence); and
- Information obtained through any interviews and assessments with you.

Information we obtain from other sources

Where appropriate, this may include:

- personal data that we collect from screening, background and/or reference checks we may perform on you as part of the recruitment process, which may include your address history, your credit history, your qualifications (both academic and professional), your previously held directorships (if any); and
- a criminal records check.

Uses of your personal data

Your personal data may be stored and processed by VAM in the following ways and for the following purposes:

- to consider and progress your Application (including, in some cases, verifying your qualifications and references with those third parties you name);
- to meet our legal and regulatory obligations;
- to maintain consistent practices and procedures with respect to the collection, use, disclosure, transfer and processing of personal data across by us. These practices and procedures include the effective recording, management and administration of personal data;
- to maintain consistent practices and procedures with respect to the recruitment process;
- we may process your personal information for the purposes of equal opportunities monitoring; and
- to maintain contact with you in the future and notify you of relevant job vacancies that you might be interested in. Please note that if you do not want us to retain your information, or want us to update it at any stage, please contact us in accordance with the “Contacting us” section, at the end of this notice.

We are entitled to use your personal data in these ways because:

- we need to in order to take steps in preparation for entering into a contract with you, in particular to consider you for a position at our firm;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and/or
- the use of your personal data as described is necessary for our legitimate business interests such as:
 - allowing us to effectively assess your skills, qualifications and/or the strength and merits of your Application and your suitability for the role applied for;
 - allowing us to effectively verify your information;
 - allowing us to effectively and efficiently administer and manage the operation of our business; or
 - being able to contact you in relation to your Application and the recruitment process.

Please note, if your Application is successful and you are subsequently offered and accept employment at VAM, the information we collect during the application and recruitment process will become part of your employment record.

Sensitive personal data

What we will do with “sensitive personal data”

Certain forms of “sensitive personal data” are subject to specific protection or restriction by law in certain territories, including the EU.

For these purposes, “sensitive personal data” is data relating to: racial or ethnic origin; criminal activity or proceedings in certain countries; political opinions; religious philosophical beliefs; trade union membership genetic data, biometric data, data concerning health or sex life or sexual orientation.

We will not process your sensitive personal data unless at least one of the following conditions are met:

- you have given explicit consent in writing to the processing of the data;
- the processing is necessary for carrying out obligations and specific rights of VAM in the field of employment law, social security or social protection law (including obligations in relation to public health, health and safety and disability discrimination, the legality of personnel working in a particular jurisdiction, which will involve processing data in relation to nationality, work permits and visas, monitoring equality of racial or ethnic opportunity or treatment, and vetting (where necessary));
- the processing is necessary to protect the vital interest of you or another person where you are physically or legally incapable of giving consent;
- the data in question has been made public by you;
- the processing is necessary for the purpose of, or in connection with, any actual or prospective legal proceedings, for the purpose of obtaining legal advice or otherwise for the purposes of establishing, exercising or defending legal rights subject to applicable local legislation or where courts are acting in their judicial capacity;
- as otherwise permitted by law; and

In each case we will meet and enforce any applicable duties of confidentiality effectively, for example, in relation to access to health records.

Automated decision-making

We do not currently use and do not envisage using automated decision-making to make decisions about you in connection with the recruitment process.

Disclosure of your information to third parties

- Where personal data is disclosed to other members of VAM, we will take steps to ensure that the personal data is accessed only by VAM or our Corporate Partner, Affiliated Managers Group, Inc. (“AMG”) personnel that have a need to do so for the purposes described in this notice.

Outside of VAM

In addition to the above, VAM may share your personal data outside the firm:

- to third party agents or contractors, bound by obligations of confidentiality, in connection with the processing of your personal data for the purposes described in this notice. This may include HR outsourced service providers and consultants, IT and communications service providers, law firms, accountants and auditors (“Third Parties”); and
- to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation.

How secure is my information with third-party service providers and other entities in our group?

All our 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 our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers of personal data

Your personal data may be transferred to and stored in databases hosted and maintained outside the UK. It may be stored and processed by other VAM companies and/or Third Parties in other countries, which may include destinations outside of the European Economic Area (“EEA”).

Where your personal data is transferred outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of different ways, for instance:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with applicable data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the “**Contacting us**” section.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

In some instances, we may retain your information to consider you for other roles and future opportunities at VAM which may be of interest to you. If you do not want us to retain your information, or want us to update it at any stage, please contact us in accordance with the “Contacting us” section.

Your rights

You have a number of legal rights in relation to the personal data that we hold about you and you can exercise your rights by contacting The Human Resources Director or General Counsel.

These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us (and not, for the avoidance of doubt, information we, or other members of the VAM companies, otherwise collect about you or information we obtain about you from other sources);
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request;
- the right to object to our processing of your personal data in certain circumstances. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to continue to process it; and
- the right to lodge a complaint with the UK data protection regulator, the Information Commissioner’s Office (<https://ico.org.uk/>), if you think that any of your rights have been infringed by us.

Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed in this notice, please contact us using the following contact information:

Address:

Veritas Asset Management LLP, 1 Smart's Place, Smart's Place, Holborn, WC2B 5LW

You can address your request to our Human Resources Director or our General Counsel.