



BlueOrchard
Impact Investment Managers

Member of the
Schroders Group

Schroders Job Applicant Privacy Notice

This privacy notice applies if you are applying for employment with an affiliate of the Schroders group. The Schroders group affiliate to which you are applying for employment will be the data controller of your personal information and shall be referred to in this notice as “Schroders”, the “company”, “we”, “our” or “us”.

Schroders is responsible for ensuring that it uses your personal data in compliance with data protection law. The purpose of this notice is to explain what personal data we collect and how we use it. Please take the time to read and understand this privacy notice.

This privacy notice relates to your application to work at Schroders. Should you be offered employment with Schroders, you will be given a privacy notice relevant to employees.

Personal data collected by Schroders

Schroders will collect and process (e.g. obtain, record, use, share or hold etc.) the following personal data about you, in each case in so far as permitted by local law:

Information that you provide to the company

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, date and place of birth, email address, home address, other contact details including mobile telephone number, employment history and qualifications (both academic and professional), gender, nationality and right to work in the location where you are applying for a role, civil/marital status; 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 and your reasons for applying to Schroders.

Information we, or other members of the Schroders group, otherwise collect about you.

This includes information that is collected in connection with your application and is likely to include:

- personal data that we collect through your communication and correspondence with us, by telephone, email or otherwise (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

This may include:

- personal data that we collect from screening, background and/or reference checks we may perform on you as part of the application or 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 (where necessary for the role for which you are applying and as permitted by local law);
- information relating to your health, any ongoing conditions and any reasonable adjustments which may be necessary for the performance of the role for which you are applying.

Uses of your personal data

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

- to consider your application (including, in some cases, verifying your qualifications and references with those third parties you name) and contact you in relation to it;
- to meet our legal and regulatory obligations including if you are applying for a regulated role;
- to maintain consistent practices and procedures with respect to the collection, use, disclosure, transfer and processing of personal data across all Schroders group companies worldwide. 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 of personnel across the Schroders group, including the performance of human resources and other functions of the company;
- 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 with a member of the Schroders group 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.

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

- we need to in order to consider you for a position at Schroders and take steps in preparation for entering into a contract with you;
- we have legal and regulatory obligations that we have to discharge in connection with the recruitment process;
- 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 above is necessary for our legitimate business interests (or the legitimate interests of another Schroders group company), 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;
 - ensuring a consistent approach to the recruitment of Schroders group personnel worldwide; 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 Schroders, the information we collect during the application and recruitment process will become part of your employment record.

Sensitive personal data

Certain forms of “sensitive personal data” are subject to specific protection or restriction by law in certain territories, including the EU, Switzerland and the UK. For these purposes, “sensitive personal data” may include data relating to: racial or ethnic origin; criminal or administrative proceedings and sanctions; political opinions; religious philosophical beliefs; trade union membership; genetic data; biometric data; data concerning health or sex life or sexual orientation, social security measures, current and past administrative proceedings and sanctions. We will not process your sensitive personal data unless any legal conditions in connection with the lawful processing of such data are met and/or in accordance with any relevant local laws. This may include the following:

- the processing is necessary for carrying out obligations and specific rights of Schroders 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 interests 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;
- the processing is necessary for reasons of substantial public interest on the basis of local law which is proportionate to the aim pursued and which contains appropriate safeguarding measures;
- the processing is necessary for archiving purposes in the public interest or scientific and historical research purposes or statistical purposes;
- you have given explicit consent in writing to the processing of the data; or
- as otherwise permitted by law; and

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

Disclosure of your information to third parties

Within the Schroders group

Schroders may disclose your personal data to other members of the Schroders group for the purposes of:

- the management and administration of the Schroders group business, including the maintenance of the centralised databases storing personal data;
- enabling the performance of the functions that each of the Schroders group businesses may perform relating to regional or global HR decisions within the Schroders group; or
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures within the Schroders group.

Where personal data is disclosed to other members of the Schroders group, we will take steps to ensure that the personal data is accessed only by those Schroders group personnel that have a need to do so for the purposes described in this notice.

Outside the Schroders group

In addition to the above, Schroders (and the other Schroders group companies to whom your personal data is disclosed) may share your personal data outside the Schroders group:

- 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 outsourced HR service providers and consultants, pre-employment vetting agencies, IT and communications service providers, law firms, accountants and auditors (“Third Parties”);

- 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; and
- if we sell any of our business or assets or if we are acquired by a third party, we may disclose your personal data to the prospective buyer for due diligence purposes.

International transfers of personal data

Your personal data may be transferred to and stored in databases hosted and maintained outside the location where you live or make your application to the company. It may be stored and processed by other Schroders group companies and/or Third Parties in other countries, which (in relevant cases) may include destinations outside of the European Economic Area (“EEA”), the United Kingdom and Switzerland, such as United States, India, China, Taiwan, Australia, Bermuda, Brazil, Chile, Mexico, Hong Kong, Singapore, Indonesia, South Africa, United Arab Emirates.

Where your personal data is transferred to other locations, including (where relevant) outside the EEA, the United Kingdom and Switzerland, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in accordance with the protection given in the jurisdiction where the data is collected. 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 or relevant local data protection authority;
- the recipient signed up to a contract based on the “standard contractual clauses” approved by the European Commission and recognised by the Swiss Data Protection and Information Commissioner and adjusted to the Swiss data protection regulation, obliging them to protect your Personal Data to an adequate level.

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

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;
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data; and
- our legitimate interest – we need to retain the data in order to establish, exercise or defend our legal rights and to verify compliance with our internal processes.

In most cases we retain job applicants’ data for 6 months from the date on which the recruiting campaign for the position to which the candidate applied is closed.

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 privacy@schroders.com.

Within the EU, UK and Switzerland, 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;
- where processing is based on your consent, 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 Schroders group, 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 data protection supervisory authority competent for your country of residence, details of which can be found by following the link below, if you think that any of your rights have been infringed by us.

Please note that our recruiting process does not rely on any automated decision making.

EU data protection supervisory authorities: https://edpb.europa.eu/about-edpb/about-edpb/members_en

UK data protection supervisory authority: <https://ico.org.uk/>

Swiss data protection authority: <https://www.edoeb.admin.ch/edoeb/en/home.html>

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:

Schroders Investment Management Limited

Attn: Global Privacy Officer

1 London Wall Place,

London

EC2Y 5AU

United Kingdom

Email address: privacy@schroders.com.

You can also contact us at DPCP@blueorchard.com.

If you do not provide your data to us

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications, work history or right to work in this country), we may not be able to process your application successfully. For example, if we require references and you fail to provide us with relevant details, we will not be able to take your application further.

Last update: August 2023