



**CANDIDATE
PRIVACY STATEMENT**

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What is the purpose of this Notice?

The Bank of N.T. Butterfield & Son Limited and each of its subsidiaries (“Butterfield” or “the Group”) is a “controller” in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is applicable if you apply to work with us (whether as an employee, worker or contractor) or applying for one of our scholarships or bursaries. It makes you aware of how and why your personal data will be used, namely for the purposes of processing your application, and for how long it will usually be retained. It provides you with certain information that must be provided under privacy and data protection laws that apply to some members of the Group and to which all members of the Group have adopted.

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

In connection with your application, we will collect, store, and use the following categories of personal information about you:

- Any information you provide as part of your application
- Any information you provide to us during an interview.
- Any information collected through tests or attestation

We **may** also collect, store and use the following types of more sensitive personal information:

- Information about your race, nationality or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- you, the candidate;
- recruitment agencies;
- background check providers;
- credit reference agencies;
- your named referees;
- data from third parties or from a publicly accessible source

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How we will use information about you

We may use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the position you have applied for
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the position since it would be beneficial to our business to appoint someone to that position.

We also need to process your personal information to decide whether to enter into a contract with you (i.e. to employ you or retain your services).

Having received your application, and any other documents submitted by you or provided to us in connection with your application, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the job position or grant the award, as applicable. If we decide to offer you the job position, we will then take up references and/or carry out any other relevant checks before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application, we will not be able to process your application successfully. For example, if we require a credit check or references for an employment role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an assessment or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

For employment applications, we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the position (conditional on checks and any other conditions, such as references, being satisfactory). We may be required to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by laws and regulations applying to the Group in the jurisdictions we operate to carry out criminal record checks for those carrying out certain roles with us.
- Employment in any role with the Group requires a high degree of trust and integrity since it involves dealing with customers' personal information, sensitive commercial information and high value client money and so we would like to ask you to seek a basic disclosure of your criminal records history.

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

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

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Data sharing

Why might you share my personal information with third parties?

For employment applications we will only share your personal information with the following third parties for the purposes of processing your application: Credit and probity reference agencies, any recruitment consultant you have engaged to liaise with us, or immigration authorities where applicable. 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.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from HR-LIO@Butterfieldgroup.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

If you apply for a job or scholarship at Butterfield and your application is unsuccessful, we will retain your information for a certain period after we have communicated to you our decision. We retain your personal information so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment or scholarship award exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

We will also retain your information for the period on the basis that a further opportunity may arise in future and we may wish to consider you for that position.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing the information.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact HR-LIO@Butterfieldgroup.com

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Right to withdraw consent

When you apply for a role, you provide consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact Human Resources Local Information Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Data Protection Officer

We have appointed Local Information Officers in each of the jurisdictions where we operate to oversee compliance with this privacy notice. We have also appointed a Group Data Protection Officer to oversee compliance with Butterfield's privacy obligations across our jurisdictions. If you have any questions about this privacy notice or how we handle your personal information, please contact the Human Resources LIO Information Officer through HR-LIO@Butterfieldgroup.com. In some jurisdictions, you may have the right to make a complaint to an independent office or agency in relation to our use of your information. Details of how to make such a complaint (where available) will be provided by the Human Resources Local Information Officer upon request.

