



# Privacy Notice for Recruitment

Oct 2022



---

## Privacy Notice for recruitment

**Pepperstone group of companies** (“We”, “Us”) are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controllers are **Pepperstone Limited, Pepperstone EU Limited, Pepperstone GmbH, Pepperstone Operations Pty Ltd and Pepperstone Group Limited**

We use Workable, an online application provided by Workable Software Limited, to assist with Our recruitment process. We use Workable to process personal information as a data processor on Our behalf. Workable is only entitled to process your personal data in accordance with Our instructions.

**The Pepperstone group of companies includes:**

- **Pepperstone Group Limited, Australian registered (ACN 147 055 703)**
- **Pepperstone GmbH, German registered (HRB: 91279)**
- **Pepperstone EU Limited, Cyprus registered (Company Number HE 398429)**
- **Pepperstone Financial Services DIFC Limited, DIFC registered (Registered Number: 3460)**
- **Pepperstone Limited, UK registered (CN: 08965105)**
- **Pepperstone Markets Limited, Bahamas registered (IBC No. 177174 B)**
- **Pepperstone Finance EU Limited, Cyprus registered (Organisation Number: 408465)**
- **Pepperstone Finance Pty Ltd, Australian registered (ACN 135 927 918)**
- **Pepperstone Operations Pty Ltd, Australian registered (ACN 637 203 448)**
- **Pepperstone Markets Kenya Limited, Kenya registered (PVT-PJU7Q8K)**

**Please also refer to our Privacy Policy available on our website, [www.pepperstone.com](http://www.pepperstone.com)**

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to Our processing of your personal information in addition to Our other Privacy Notice which has been provided to you separately or is available on Our Website.

Where you apply for a job opening via the application function on a job site or similar online service provider (“Partner”), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Notice.

---

## Your Personal Information

### Information we collect from You

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills experience that you provide to Us, as well as your video in case you conduct your interview using the Video Interview feature.
- If you contact Us, We may keep a record of that correspondence.
- A record of your progress through any hiring process that We may conduct.
- Details of your visits to Workable's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access.

### Information we collect from other sources

Workable provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

Workable's technology allows Us to search various databases – some publicly available and others not, which may include your personal data (include your CV or Resumé), to find possible candidates to fill Our job openings. Where We find you in this way We will obtain your personal data from these sources.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for Our business more generally.

### Uses Made Of Your Information

#### Lawful basis for processing

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

Where you apply for a job opening through the Indeed Apply functionality, We rely on your consent, which is freely given by you during the application process, to disclose your personal data to Indeed on the basis described below.

---

### Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that We receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- To help Our service providers (such as Workable and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve their services.

### Automated decision making/profiling

We may use Workable's technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by Our staff.

## Disclosure of Your Information

As set out above, We pass your information to Our third party service providers, including Workable, who use it only in accordance with Our instructions and as otherwise required by law.

Where you have applied for a job opening through the Indeed Apply functionality, and where you have consented to this disclosure, We will disclose to Indeed certain personal data that We hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through Our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that We hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

Where you have applied to a job opening through another service provider, We may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

## How We Store Your Personal Data

### Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

---

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

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

#### Where We store your personal data

Where We store your personal data in Our own systems, it is stored **in a number of locations including United Kingdom and European Economic Area ("EEA"), Australia, Singapore and the United States.**

The data that We collect from you and process using Workable's Services may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for Us or for one of Our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA. A Data Processor Agreement has been signed between Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom OR EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

#### How long We keep your personal data

We will hold all the data for **24** month.

Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you (or by another person engaged by the Customer); or
- receipt of a written request by you (or another person engaged by the Customer) to us.

#### Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require Us to correct any mistakes in your information which We hold

- 
- require the erasure of personal data concerning you in certain situations
  - receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
  - object at any time to processing of personal data concerning you for direct marketing
  - object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
  - object in certain other situations to Our continued processing of your personal data
  - otherwise restrict Our processing of your personal data in certain circumstances
  - claim compensation for damages caused by Our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- contact Us using Our Contact details below,
- let Us have enough information to identify you,
- let Us have proof of your identity and address, and
- let Us know the information to which your request relates.

## How to complain

We hope that We can resolve any query or concern you raise about Our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <http://ico.org.uk/concerns/> or telephone: [+44303-123-1113](tel:+44303-123-1113).

## Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to [compliance.au@pepperstone.com](mailto:compliance.au@pepperstone.com)