

# Employee privacy notice

## For UK CGWM

### Introduction

In this notice, 'CGWL', 'we', 'us' and 'our' means Canaccord Genuity Wealth Limited. We are registered in the UK and our registered address is 41 Lothbury, London, EC2R 7AE and the company registration number is 03739694.

In this notice, a 'CG Company' refers to a company which is a member of the Canaccord Genuity group of companies.

This notice is issued pursuant to the General Data Protection Regulation EU 2016/679 (GDPR) and is effective from 25 May 2018. The notice may be updated from time to time.

For the purposes of data protection law, CGWL is a data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection law. This notice explains how CGWL processes personal data about its employees and includes information about your data protection rights.

This notice applies if you are an employee, a fixed term contract employee, a contractor, an agency worker, a consultant or a non-executive director of CGWL. This notice sets out the basis on which any personal data about you will be processed by us. Please take the time to read and understand this notice.

### What information does CGWL process and for what purposes?

'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

CGWL process information that you provide to us directly and information that we gain through your use of our systems. Further information relating to these occasions are detailed below.

### HR information

The data we gather from you during the onboarding process and information relating to the employee life cycle may include:

- Recruitment (name, date of birth, CV, any interview notes taken, records of interviews attended);
- Onboarding (bank details, personal data, personal contact details, next of kin/ emergency contact details, background screening information, salary and employment details, qualifications held);
- Planner (records of all absences logged in the system i.e. holidays, sickness, other absences);
- Training (records relating to the Company's Training and Competency regime, other training undertaken);
- Appraisals (goals set throughout the duration of employment, any comments attached by you or your line manager); and
- Employment documentation (any documents relating to your employment with the Company may be attached to your record i.e. employment contract, any letters relating to changes in your terms and conditions etc.).

Please note this that list is not exhaustive. Only members of the HR team and payroll administrators will have access to process this information, however line managers will have access to limited information to support them in the performance of their job role.

### Internal monitoring

CGWL currently uses Global Relay and Proofpoint as part of the email monitoring

process. Any emails sent to and from a CGWL email account can be accessed by the CGWL Compliance Department and IT Department. This includes emails sent from HR that may include sensitive information. All financial data are sent in password protected files.

### Access to data

Any employee information held on the internal network will be accessible by the CGWL HR team and in the event of a technical issue, the IT Department.

### Emergency contacts

The next of kin, or emergency contact details that you provide to CGWL will be used if you are taken ill at work. You should make sure that your emergency contact is aware that their details may be used in this event. CGWL will process these individuals' details to log them as a contact in your online employee record and delete or update them should you request it.

### Disaster recovery

As part of our process in the event that you are prevented from working at our offices, and/or our Business Continuity Plan (BCP)/Disaster Recovery procedures are invoked, CGWL will contact you via text message to clarify that all employees are accounted for. Your name and contact telephone numbers are stored on an online portal and are accessible by those that administer the system. Telephone numbers will also be confirmed within a BCP document that is available on our intranet.

### Employee photographs, visual and video recordings

Photographs of all those that are covered by this privacy notice will be used for display on building access cards to ensure the security of the building. Staff photographs may also be displayed from time to time on the company website.

You may be asked to participate in visual or audio recordings or may appear in the background of such recordings. These recordings may be used by CGWL for commercial purposes and published on its website.

## CCTV/Security Systems

CGWL uses CCTV and security systems to ensure the safety of its employees. We may also use this information to monitor attendance at the office.

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

- **Contract:** the processing is to perform our obligations and exercise our rights within your contract of employment with us;
  - **Occupational health:** the processing is necessary for the purposes of occupational health and to take decisions regarding your fitness for work;
  - **Legal obligation:** the processing is necessary for CGWL to comply with our legal and regulatory obligations (not including contractual obligations);
  - **Legal proceedings:** the processing is necessary in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and
  - **Legitimate interests:** the processing is necessary for the legitimate interests of CGWL (or the legitimate interests of a CG Company), such as:
    - allowing us to effectively and efficiently administer and manage the operation of our business;
    - ensuring a consistent approach to the management of our employees and the employees of CG Companies worldwide;
    - maintaining compliance with internal policies and procedures as well as applicable laws, rules and regulations; or
    - being able to contact you or your family in the event of an emergency.
- **Legal obligations:** We disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights. This may include disclosure to any competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunal in any jurisdiction (i) for or in connection with an investigation; (ii) pursuant to a court order or other legal process; or (iii) at the express direction of any other authorised government agency.
  - **Audit information:** CGWL is subject to internal and external audits and because of this, your employee record may be randomly selected for review. If this happens, the HR team will send information relating to your onboarding and induction via secure email to the relevant audit team. Please note that this information will be minimised as much as possible to ensure only relevant data is processed. This process can also relate to an employee documented as a leaver to audit that the leaver process was adhered to.
  - **Length of service:** To recognise length of service, we are required to send information to our Canada head office and a third party. The information sent to Canada relates to your length of service only and provides the information to be included in your recognition letter from the President & Chief Executive Officer - CGGI. The same information is sent to a third party to create your length of service gift from CGWL.
  - **Internal policies and procedures:** In accordance with internal policies and procedures relating to compliance, risk and business oversight, CGWL may process and exchange personal data with a CG Company, its senior management, board of directors, leadership team, compliance team, financial crime team, risk team, legal team, finance and tax team.
  - For the purpose of **due diligence** in connection with a change of ownership of CGWL or any of its business assets.

- the country that we send the data to might be approved by the European Commission as offering a sufficient level of protection (through an adequacy decision);
- 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.

We transfer personal data to CG Companies which may be outside the EEA (including Canada) which may have different standards to those which apply in the EEA. Canada benefits from a European Commission adequacy decision. For others, we have arranged for specific safeguards to be put in place. In some 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 data protection law.

## For how long will CGWL hold your personal data?

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

- the purpose for which we are using your personal data – 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.

## What are your rights in relation to your personal data?

You have a number of legal rights in relation to the personal data that we hold about you. 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;

## Disclosure of your information

CGWL may disclose your personal data to a third party or an affiliate CG Company in the following circumstances and for the following purposes:

- **Suppliers and agents:** For the purposes of providing services to CGWL. Services providers include insurance providers, employee benefits service providers, HR services, payroll providers, pension plan providers, compensation consultants, travel agencies, transportation services, IT and communications providers, law firms, accountants and auditors. Third parties and any CG Company will be subject to confidentiality requirements and they will only use your personal data as described in this notice.

## Transfers of personal data outside the European Economic Area (EEA)

The personal data that we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by individuals operating outside of the EEA who work for a CG Company or for one of our suppliers.

Where we transfer your personal data 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 ways, for instance:

- 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 object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

If you wish to exercise these rights or you have any queries about your personal data, please contact the HR team. You can find out more information about your rights by contacting the data protection regulator in your jurisdiction, the Information Commissioner's Office, or by searching their website at <https://ico.org.uk/>.

## Deletion of records

Any HR information gathered over the course of your employment will be retained in accordance with the Retention of Former Employees Records policy. A copy of this policy will be provided to an employee who is leaving the CGWIL or is available upon request from HR.

## Changes to this notice

If we modify this notice at any time, we will place the modified versions on Sharepoint under the My World section and the Human Resources-UK page. We encourage you to regularly review this notice to ensure that you are always aware of what personal data we collect and how we use and disclose it.