

## Candidate Privacy Notice

Crestbridge Family Office Services (Crestbridge) is made up of different legal entities. These entities include, but are not limited to, Crestbridge Family Office Services Limited, Crestbridge Fiduciary Limited (the Affiliation Leader) and its participating members, Crestbridge Trustees Limited, Corporate Trust Company Limited, Pacaya Investments Limited, Pacaya Director 1 Limited and Pacaya Director 2 Limited. This privacy policy is issued on behalf of the Affiliation so when we mention Crestbridge, "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Crestbridge Affiliation responsible for processing your data. Further details are set out below.

We take the privacy and security of your personal information very seriously and will only use your personal information as set out in this Candidate Privacy Notice or as we may otherwise inform you from time to time.

As a candidate of Crestbridge then the Controller of your personal information throughout the application process will be:

Crestbridge Fiduciary Limited  
40 Don Street  
St Helier  
Jersey  
JE2 4TR  
Channel Islands

Following successful completion of your application and in the event you come to work for Crestbridge your personal information will be processed in accordance with our Employee Privacy Notice which is available on request and sets out, amongst other things, the details of the new Crestbridge controller of your personal information in those circumstances.

"Crestbridge", "we", "us", "our" in this Candidate Privacy Notice are references to Crestbridge Fiduciary Limited.

Crestbridge has a Data Protection Lead who can be contacted at:

Data Protection Lead  
Crestbridge Fiduciary Limited  
40 Don Street  
St Helier  
Jersey  
JE2 4TR  
Channel Islands

or by email: [dataprotection@crestfos.com](mailto:dataprotection@crestfos.com)

### 1. What information does Crestbridge collect and why?

As part of any recruitment process, Crestbridge collects and processes personal data relating to candidates. Crestbridge is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Crestbridge collects and/or processes a range of information about you for various purposes.

This may include the following personal information:

|     | <b>Information</b>                                                                                                                                                                                                                                                | <b>Purpose</b>                                                                                                                                  | <b>Primary Legal Basis</b>                                                           |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| 1.1 | Your name, title, address and identification documentation such as passport or driving licence and recent utility bill or bank statement.                                                                                                                         | To identify you and enable Crestbridge to take steps to offer and provide you with a contract and undertake any necessary screening checks.     | Contract<br>Legal Obligation<br>Legitimate Interests<br>Employment and Social Fields |
| 1.2 | Your email address and telephone number.                                                                                                                                                                                                                          | To enable Crestbridge to communicate with you during the recruitment process and to take steps to offer and provide you with a contract.        | Contract                                                                             |
| 1.3 | Date of birth and gender.                                                                                                                                                                                                                                         | To comply with employment legislation and equal opportunities and anti-discrimination legislation and undertake any necessary screening checks. | Legal Obligation                                                                     |
| 1.4 | Details of your existing / past employment remuneration (salary and benefits details).                                                                                                                                                                            | To ensure our expectations are aligned in terms of proposed salary and benefits for your potential new role.                                    | Legitimate Interests                                                                 |
| 1.5 | Terms and conditions of your potential employment.                                                                                                                                                                                                                | To comply with employment legislation in terms of the provision of employment terms.                                                            | Legal Obligation                                                                     |
| 1.6 | Your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Crestbridge and including your CV and any details contained on any covering letter or application form or disclosed at interview. | To ensure you are appropriately qualified and experienced for the job and/or to help facilitate any employee screening checks required.         | Legitimate Interests<br>Legal Obligations                                            |
| 1.7 | Remuneration and tax details, including entitlement to benefits such as pensions or insurance cover.                                                                                                                                                              | To comply with contractual requirements and employment, tax and social security legislation.                                                    | Contract<br>Legal Obligation                                                         |
| 1.8 | National insurance or social security number (or regional equivalent).                                                                                                                                                                                            | To comply with employment, tax and social security legislation.                                                                                 | Legal Obligation                                                                     |

|      |                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                               |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.9  | Marital status, next of kin, dependents.                                                                                                                                  | To comply with contractual requirements including benefits and insurances.                                                                                                                                                                                                                                                                                                                                                                                               | Contract                                                                                                                                                                                                                                                                                                                                                      |
| 1.10 | Nationality and entitlement to work in the jurisdiction in which you are employed.                                                                                        | To comply with applicable immigration and licensing laws, and/or to help facilitate any employee screening checks required.                                                                                                                                                                                                                                                                                                                                              | Legal Obligation                                                                                                                                                                                                                                                                                                                                              |
| 1.11 | Information about whether you are an undischarged bankrupt or have an arrangement with creditors or other external administration.                                        | To ensure you are appropriately qualified for the job and/or to help facilitate any employee screening checks required.                                                                                                                                                                                                                                                                                                                                                  | Legal Obligation                                                                                                                                                                                                                                                                                                                                              |
| 1.12 | Information about any act, neglect or default which would not allow you to be a member of any professional institute.                                                     | To ensure you are fit and proper to carry out the role and help facilitate any employee screening checks required.                                                                                                                                                                                                                                                                                                                                                       | Legal Obligation                                                                                                                                                                                                                                                                                                                                              |
| 1.13 | Details of your schedule (days of work and working hours) and attendance at work;                                                                                         | To comply with contractual requirements including as to holiday, flexible/agile working.                                                                                                                                                                                                                                                                                                                                                                                 | Contract                                                                                                                                                                                                                                                                                                                                                      |
| 1.14 | CCTV images and electronic, telephonic or written correspondence between us.                                                                                              | <p>CCTV images may be collected if you come to our offices for a physical interview or to drop in or collect any paperwork. These images are primarily collected for the prevention, detection, investigation and prosecution of fraud or other unlawful acts.</p> <p>CCTV imagery may also be collected for health and safety purposes.</p> <p>Electronic, telephonic or written correspondence will be used to communicate with you during the recruiting process.</p> | <p>Legal Obligations (to prevent certain criminal actions which may include bribery, tax evasion, money laundering or fraud); and/or</p> <p>Legal Obligations - regulatory (where electronic or telephonic correspondence is "business correspondence"); and/or</p> <p>Legitimate Interests; and/or</p> <p>To Establish, Exercise or Defend Legal Claims.</p> |
| 1.15 | Training you have, are or will be participating in as well as reports from training providers, mock exam results and actual exam results for professional qualifications. | To comply with any contractual obligations and address applicable regulatory (such as data protection and money laundering) laws regarding staff training and continuous professional development.                                                                                                                                                                                                                                                                       | Contract<br>Legal Obligations                                                                                                                                                                                                                                                                                                                                 |

When using our website you should also please refer to our Cookies and Website Tracking Tools information at [Cookies - Crestbridge \(crestfos.com\)](https://crestfos.com)

It may also include the following special category / sensitive personal data:

|      | Information                                                     | Purpose                                                                                                               | Legal Basis                                                         |
|------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| 1.16 | Criminal Record.                                                | As a regulated business Crestbridge is obliged to screen its employees, including undertaking criminal record checks. | Legal Obligation<br>Employment and Social Fields                    |
| 1.17 | Medical/Health (including disabilities or maternity/paternity). | To comply with employment legislation and equal opportunities and anti-discrimination legislation.                    | Legal Obligation<br>Vital Interests<br>Employment and Social Fields |
| 1.18 | Details of any trade union memberships held.                    | To check off for union subscriptions / attendance.                                                                    | Legal Obligation<br>Employment and Social Fields                    |
| 1.19 | Ethnic origin.                                                  | To comply with equal opportunities and anti-discrimination legislation.                                               | Consent<br>Employment and Social Fields                             |
| 1.20 | Sexual orientation.                                             |                                                                                                                       |                                                                     |
| 1.21 | Religious or philosophical beliefs.                             |                                                                                                                       |                                                                     |

Whilst processing is predominantly required to comply with Crestbridge's Legal Obligations or is necessary to take steps to enter you into a Contract with Crestbridge in the context of Crestbridge's potential employee relationships then where circumstances require it, and we are lawfully permitted to do so Crestbridge may also process personal information to:

- Prevent and detect unlawful acts/fraud; and/or
- Exercise, bring or defend legal claims.

Where Crestbridge relies exclusively on legitimate interests as a lawful basis for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not, and you have a right to object to and challenge Crestbridge's assessment.

Where Crestbridge processes other special categories of personal data, such as information about ethnic origin, sexual orientation, religious or philosophical beliefs, this is done for the purposes of equal opportunities monitoring. Data that Crestbridge uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

## 2. Where we obtain your personal information

| Source |                                                                                                                                                                                                                                                                                    |
|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.1    | Information you provide directly to Crestbridge:<br><br>(a) on such forms and documents (for example your C.V.) as you may complete and provide to us either by way of enquiry or as we may require from you in respect to any position at Crestbridge we liaise with you over; or |

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | (b) on such documents as are submitted to us as part of our staff screening procedures and/or in compliance with any other statutory or regulatory requirements;<br>(c) any personal information provided by way of correspondence with us by telephone, e-mail, in interview or other forms of assessment.                                                                                                                                                                                                                                                                                                                                              |
| 2.2 | Information Crestbridge receives about you from third party sources being:<br>(a) your referees / previous employers;<br>(b) recruitment agents;<br>(c) our employment screening/background check providers;<br>(d) companies registries, court databases, published sanctions/sanctions databases, financial crime databases or credit reference databases;<br>(e) regulators or other official authorities;<br>(f) other publicly available information such as published articles and online content.<br><br>Crestbridge will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so. |
| 2.3 | Information Crestbridge obtains through monitoring activities undertaken by us via:<br>(a) CCTV use in our different office premises when you visit us;<br>(b) Cookies and similar technology in use on our website(s) – please refer to our Cookies and Website Tracking Tools information at <a href="#">Cookies Policy - Crestbridge (crestfos.com)</a>                                                                                                                                                                                                                                                                                               |

Processing your data allows Crestbridge to, amongst other things:

- Assess your skills, qualifications and suitability for work;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Determine whether you need any reasonable adjustments during the recruitment process;
- Keep records related to our hiring processes; and
- Comply with legal or regulatory requirements.

We also need to process your personal information to decide whether to enter into a contract with you or to determine whether you meet our requirements in order so that we can shortlist, interview or recruit you.

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

We may process information about criminal convictions. We will collect information about your criminal convictions history if we would like to offer you work (conditional on checks and any other conditions, such as references, being satisfactory). There may be regulatory requirements that require us to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

### 3. Sharing personal information

3.1 Unless otherwise stated then Crestbridge may share your personal information:

- 3.1.1 within our group of companies including to our affiliates;
- 3.1.2 with certain approved third party service providers including our employee screening/employment check and benefit providers;
- 3.1.3 where we need to contact any of your referees/past employers to obtain employment references;

- 3.1.4 with any recruitment/employment agency that has referred you to us;
  - 3.1.5 to our professional advisers and insurers;
  - 3.1.6 where we are subject to a legal obligation that necessitates the sharing of this information with other parties such as regulatory authorities, tax and revenue authorities, companies registries, governmental departments, courts and law enforcement authorities.
- 3.2 The companies within the Crestbridge Affiliation are all based in Jersey.
- 3.3 The third party service providers to whom your personal information may be transferred are based primarily in the countries/territories where we have a jurisdictional presence, but may also be based in other European Economic Area countries, and in a few exceptional circumstances outside of the European Economic Area or those other countries / territories in which we have a jurisdictional presence.

Where we share your personal information with companies within the Crestbridge Affiliation and/or third party service providers outside of Jersey, the UK or the European Economic Area, and where we are not otherwise subject to a legal obligation to share your personal information, then we require the recipients of that personal information to put in place adequate measures to protect it, including by entering into appropriate data sharing agreements such as the EU standard contractual clauses.

#### **4. How does Crestbridge protect data?**

- 4.1 Crestbridge takes the security of your data seriously. Crestbridge has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.
- 4.2 Where Crestbridge engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.
- 4.3 If you would like further information about the safeguards we have in place to protect your personal information, please contact at [dataprotection@crestfos.com](mailto:dataprotection@crestfos.com).

#### **5. Retention of personal information**

- 5.1 Your personal information will be retained for as long as required:
- 5.1.1 by data protection laws and any other applicable laws or regulatory requirements;
  - 5.1.2 for the purposes for which the personal information was collected;
  - 5.1.3 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations.
- 5.2 If your application is unsuccessful, Crestbridge may ask your consent to keep your personal information on file in case there are future employment opportunities for which you may be suited.
- 5.3 If we rely on consent to process your personal information, you are free to withdraw your consent at any time.
- 5.4 For further information about applicable retention periods, please contact the Data Protection Lead: [dataprotection@crestfos.com](mailto:dataprotection@crestfos.com).

## 6. Your Data Protection Rights

- 6.1 Depending on the country or territory in which Crestbridge's processing of your personal information takes place and/or where you are then, subject to any relevant conditions or exemptions, you may have some or all of the following rights in respect of the personal information about you that we process:
- 6.1.1 the right to access and obtain a copy of your personal information;
  - 6.1.2 the right to correct inaccurate, incomplete or outdated personal information;
  - 6.1.3 the right to erase personal information;
  - 6.1.4 the right to restrict our processing of your personal information;
  - 6.1.5 the right to object to our processing of your personal information (in particular for marketing purposes or where it is processed in our legitimate interest);
  - 6.1.6 the right not to be subject to a decision based solely on the automated processing by us of your personal information;
  - 6.1.7 the right to port (i.e. move) your personal information;
  - 6.1.8 the right to not provide or withdraw consent;
  - 6.1.9 the right to compensation where we or another organisation has caused you damage as a result of our processing of your personal information; and
  - 6.1.10 the right to seek a judicial (i.e. court) remedy where you consider we have acted or are about to act in breach of the relevant data protection legislation.

- 6.2 You also have the right to lodge a complaint about our handling of your personal information with a relevant data protection supervisory authority either in the country/territory in which you are located and/or in the jurisdiction in which we are located and process your personal information.

For Jersey, you can contact the Jersey Office of the Information Commissioner at the following address:

Office of the Information Commissioner  
5 Castle Street  
St. Helier, Jersey, JE2 3BT

Or by telephone at +44 1534 716530 or by email at [enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org).

- 6.3 Whenever you are considering lodging a complaint however we should please be grateful if you would first allow us the opportunity to resolve your complaint by addressing it in writing, and providing as much detail as possible, to [dataprotection@crestfos.com](mailto:dataprotection@crestfos.com).
- 6.4 If we ever rely on your consent to process your personal information, you also have the right to withdraw that consent at any time.
- 6.5 If you wish to receive more information about your data protection rights or to exercise any of your rights, please contact [dataprotection@crestfos.com](mailto:dataprotection@crestfos.com).

## 7. What if you do not provide personal information?

You are under no statutory or contractual obligation to provide personal information to Crestbridge during the recruitment process however, if you do not provide the information, Crestbridge may not be able to process your job application properly or at all and this may ultimately result in our withdrawing your application from the process or being unable to offer you employment with Crestbridge.

## 8. Inaccurate or amended information

- 8.1 Please let us know as soon as possible if any of the personal information we hold about you changes (including your correspondence details).

8.2 Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to run the recruitment process and/or hire you.

## **9. Changes to this privacy notice**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice or make it readily available to you when we make any updates.

## **10. Questions**

If you have any questions about this Privacy Notice or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact **[dataprotection@crestfos.com](mailto:dataprotection@crestfos.com)**.