

**CANDIDATE DATA PRIVACY NOTICE**

In this notice, “we”, “us” and “our” means Gulf Capital Limited. Gulf Capital Limited is registered at Dubai International Finance Centre (“DIFC”), Unit 28-02, Level 28, Currency House, Tower 2, DIFC, P.O. Box 506965, Dubai, United Arab Emirates.

We would be grateful if you would read the information set out below before submitting your CV and/or application form, or immediately if you have already submitted your CV and/or application form.

**About this privacy notice**

For the purposes of DIFC Data Protection Law No.5 of 2020, we are a Controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with DIFC Data Protection Law No.5 of 2020. This privacy notice sets out the basis on which any personal data about you will be processed by us.

If you are offered employment with us, the offer will be conditional upon the information you provide during the course of the application process being correct. If you accept an offer of employment and any of the information provided by you is subsequently found to be incorrect, your employment with us may be terminated (or any offer thereof withdrawn).

Please take the time to read and understand this privacy notice.

**Personal data that we may collect about you**

We may collect and process the following personal data about you:

- **Information that you provide to us or one of our affiliates.** We will process information that you give us by submitting any applications, filling in forms or through any other communication with us, whether face-to-face, by phone, e-mail or otherwise during the application process. This may include:
  - your full name (including previous names), date and place of birth, gender, nationality, citizenship, marital status, Emirates ID / social security number, bank account details, ID card, passport copies, email address, postal address, phone telephone number, qualifications, education and employment history;
  - information about your previous and current level of remuneration, including benefit entitlements;
  - other information provided by you in an application form, CV or resume or during an interview;
  - information about your entitlement to work in the country in which you are employed;
  - results of interview process tests or assessments; and
  - health information and/or disability status.
- **Information we obtain from other sources.** This is likely to include information about you such as:
  - your past performance at work and other information provided from your previous and/or current employer(s);
  - personal or professional references from third party referee(s) that you provide to us; and
  - opinions expressed by others about you from other individuals.

**Lawful basis for processing your personal data**

We will use your information primarily to allow us to comply with legal obligations and to consider your job application prior to entry into any contract of employment.



### **Uses of your personal data**

Subject to applicable law, your personal data may be stored and processed by us in the following ways and for the following purposes:

- to consider your job application (including, in some cases, verifying your qualifications, education and references with those third parties you name);
- compliance with any legal or regulatory obligation to which we are subject (including compliance with any request from regulatory authorities or other relevant public authorities);
- for equal opportunities monitoring; and
- if your application is unsuccessful, we may keep your information on record for up to two (2) years to notify you of relevant job vacancies with us that you may be interested in, in the future.

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

- we need to in order to consider you for employment with us;
- we have legal and regulatory obligations that we have to discharge;
- we may need to for the purposes of occupational health and to take decisions regarding your fitness for work and health insurance requirements;
- we may need to consider your eligibility for a visa;
- the use of your personal data as described may be necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
  - ensuring that we have made appropriate checks on the qualifications, education and experience that applicants tell us they have;
  - maintaining compliance with internal policies and procedures; or
  - allowing us to effectively and efficiently administer and manage the operation of our business.

In addition to the above, we reserve the right to collate, process and disseminate any statistics based on an aggregation of personal data held by us, provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.

In certain circumstances not providing the requested personal data may affect our ability to meet the above purposes and may impact on our ability to process your application.

### **Disclosure of personal data to affiliates and third parties**

We may disclose your personal data to our affiliates for the purposes of:

- the management and administration of our business and our affiliates' business
- complying with the functions that each of them may perform relating to regional or global HR, legal, compliance or business management decisions
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures across our business and our affiliates' businesses; and
- the administration and maintenance of the databases storing personal data relating to prospective employees.

We will take steps to ensure that the personal data is accessed only by employees of our affiliates that have a need to do so for the purposes described in this Notice. We may also share your personal data with third parties outside of the Gulf Capital Group for the following purposes:

- for the purposes of assessing your application and verifying the information that you have provided
- to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation or to establish, exercise or defend our legal rights





- to our service providers (for example, the providers of our electronic data storage services and candidate relationship management tool) for the purposes of providing services to us.

These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this Notice. Your data will not be used for direct marketing.

### **International Transfers of Personal Data Outside the DIFC**

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

Where we transfer your personal data outside of the DIFC, we will ensure that it will be protected by adequate safeguards and is utilised in a manner that is consistent with how your personal data will be processed by us in the DIFC.

You can obtain more details of the protection given to your personal data when it is transferred outside of the DIFC by contacting us in accordance with the “Contact us” section below.

### **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, or altered or disclosed. In addition, we limit access to your personal data to those employees, agents, advisers and other third parties who have a business need to know such as HR or the Hiring Manager. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

### **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 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.

### **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 through the details in the Contact Us section.

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 you have actively provided your consent for us to process your personal data, 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;
- 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 we can refuse to act on this request in limited circumstances;

- where your data was attained by a third party, the right to receive the source from which the data was attained;
- 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 refuse that request; and
- the right to lodge a complaint with the Commissioner if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contact us” section below.

### **Contact 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 above, please address questions, comments and requests to the Data Protection Officer, Christine Succar at [lcd@gulfcapital.com](mailto:lcd@gulfcapital.com) or Gulf Capital Limited at Unit 28-02, Level 28, Currency House, Tower 2, DIFC, P.O. Box 506965, Dubai, United Arab Emirates.

You also have the right to complain to the Commissioner, the DIFC supervisory authority for data protection infringements and you can find out more information about your rights by visiting the DIFC website <https://www.difc.ae/business/operating/data-protection/> or contacting the Commissioner of Data Protection for the DIFC.