

CHEYNE CANDIDATE DATA PRIVACY NOTICE

INTRODUCTION

Cheyne Capital Management (UK) LLP ("the Partnership") is committed to protecting the personal data of its job applicants, employees, partners and investors and those of its associated companies. This Notice sets out important information about how the Partnership and its associated companies ("Cheyne" "we" or "us") collect and use your personal data during the course of the application and recruitment process.

SCOPE

This Notice applies to job applicants. In connection with the recruitment process, the relevant data controller is Cheyne Capital Management (UK) LLP, Stornoway House, 13 Cleveland Row, London, SW1A 1DH. You should read this Notice carefully and raise any questions you may have with your HR contact.

WHAT PERSONAL DATA DO WE COLLECT?

Personal data means information which identifies you and relates to you as an individual. Cheyne will collect, use and store your personal data for a variety of reasons in connection with the application and recruitment process. We have set out below the main categories of candidate personal data which we may process in connection with our recruiting activities:

- personal contact information (including your name, home address, personal telephone number(s) and personal e-mail address)
- work history and other relevant experience including information contained in CV, cover letter or job application form
- education information including degrees awarded, transcripts and other information provided in support of the job application
- qualifications and memberships of professional bodies
- compensation history
- whether any family members work for Cheyne
- information collected during phone screenings and interviews
- details regarding the type of employment sought, desired salary, willingness to relocate, job preferences, and other information related to compensation and benefits
- reference information, credit history and information received from background checks including information provided by third parties
- information related to previous applications to us or previous employment history with us
- documents evidencing your right to work (including information about your nationality / citizenship and immigration status where relevant)
- date of birth
- financial regulator registration
- information gathered through Cheyne's monitoring and/or recording of its IT systems, audio conferencing and telephone systems and building access records
- CCTV recordings made in reception and areas adjoining Stornoway House
- in relation to your communications with us and attendance at our premises

The majority of the personal data to be provided by you is mandatory in connection with our recruiting activities. Failure to provide mandatory personal data may affect our ability to accomplish the purposes stated in this Notice, including considering your suitability for employment and/or

entering into a working relationship with you either as employee or member.

The list set out above is not exhaustive, and there may be other categories of personal data which Cheyne collects, stores and uses in the context of the application and recruitment process.

The majority of the personal data which we process will be collected directly from you. However, your personal data may also be provided to us by third parties, such as recruitment agencies, former employers, education establishments, official bodies (such as a financial regulator or criminal record bureau) or medical professionals

REFERENCING AND VETTING

As part of our referencing and vetting procedures, a company engaged by us may contact certain third parties in order to verify your personal information (including personal information that you provide as part of the application and recruitment process). These third parties may include:

- former employers in order to verify your previous employment history
- credit reference agencies in order to verify your financial probity
- the criminal record bureau (see further below)
- education establishments you attended in order to verify your education history

We will only seek this information in relation to successful candidates that have accepted a conditional offer of employment with us and we will specifically inform such candidates that we will be contacting these third parties in advance of doing so.

HOW AND WHY DO WE USE YOUR PERSONAL DATA?

Cheyne uses your personal data for a variety of purposes in order to take steps necessary to enter into an employment contract or membership agreement with you, to comply with legal obligations or otherwise in pursuit of its legitimate business interests. We have set out below the main purposes for which candidate personal data is processed:

- to identify and evaluate job applicants, including assessing skills, qualifications and experience
- verifying candidate information and carrying out prior employment, background and reference checks, where applicable and in order to prevent fraud
- communicating with you about the recruitment process and your application
- to comply with our legal, regulatory, or other corporate governance requirements

This list is not exhaustive and Cheyne may undertake additional processing of personal data in line with the purposes set out above.

WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS?

Certain categories of data are considered "special categories of personal data" and are subject to additional safeguards.

Cheyne will always treat special categories of personal data as confidential and will only share such data internally where there is a specific and legitimate purpose to do so. We have also implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure.

Cheyne limits the special categories of personal data which it processes as follows:

- **Health Information**

We may process information about a candidate's physical or mental health in compliance with our obligations owed to disabled applicants.

If a candidate is successful, any health information processed as part of the recruitment process that is relevant to Cheyne's compliance with its obligations in connection with employment will be retained and processed in accordance with the Employee and Member Privacy Notice.

If a candidate is unsuccessful, any health information obtained as part of recruitment process will be deleted with the rest of the candidate's personal data, as set out below. Health information will be password protected.

- **Criminal Record Information**

Given the nature of our business, we may ask successful candidates who have accepted a conditional offer of employment to disclose their criminal record history and we may carry out criminal record checks as part of our background vetting process and in compliance with our obligations.

Criminal record information will be deleted once the applicable checks have been completed subject to any exceptional circumstances. A record of the outcome of any criminal record check will remain on the individual's record to indicate the check was clear or the offence/s were considered and cleared. That record will be password protected and will only be accessible by the Chief Financial Officer and the HR department.

WHEN DO WE SHARE YOUR PERSONAL DATA?

Cheyne will share your personal data with other parties only in limited circumstances in order to take steps necessary to enter into the employment contract or membership agreement where necessary to comply with a legal obligation, or otherwise in pursuit of its legitimate business interests as follows:

- recruitment agencies
- background vetting specialists
- occupational health providers and appointed doctors
- accountants, lawyers and other professional advisers
- financial regulatory authorities

Other than where Cheyne shares personal data with a regulatory or governmental body, your personal data will only be shared under the terms of a written agreement between Cheyne and the third party which includes appropriate security measures to protect the personal data in line with this Notice and our obligations. The third parties are permitted to use the personal data only for the purposes which we have identified, and not for their own purposes, and they are not permitted to further share the data without our express permission.

Given Cheyne's operations outside the UK, we will also share your personal data with other group companies from time to time for the purposes set out in this Notice. In particular, the Partnership shares employee personal data with other group companies for the purposes of recruitment, HR support and administration.

In all cases, where personal data is transferred from the UK, which is within the European Economic Area ("EEA") to a country outside of the EEA which is deemed not to have the same level of

protection for personal data as the EEA, Cheyne has put in place a written data transfer agreement to protect the personal data which incorporates the standard contractual clauses approved by the European Commission. If you have any questions about the transfer of your personal data in these circumstances, please contact your HR contact.

FOR HOW LONG WILL MY PERSONAL DATA BE RETAINED?

Cheyne's policy is to retain personal data only for as long as needed to fulfil the purposes for which it was collected, or otherwise as required under applicable laws and regulations. Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you.

For unsuccessful candidates:

- We will typically retain personal data collected during the recruitment process and stored in our recruitment database for a maximum period of 12 months from the end of the process subject to any exceptional circumstances.
- We will typically retain personal data held in archived e-mails or other electronic files for five years.

If you are offered and accept employment or partnership with us, the personal data we collected during the application and recruitment process will become part of your employment record and we will use it in connection with your employment or membership in accordance with the Employee Privacy Notice.

WHAT ARE MY RIGHTS IN RELATION TO MY PERSONAL DATA?

Cheyne will always seek to process your personal data in accordance with its obligations and your rights.

You will not be subject to hiring decisions based solely on automated data processing without your prior consent.

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data. You also have the right to request the transfer of your personal data to another party in a commonly used format. If you have any questions about these rights, please contact your HR contact.

You have a separate right of access to your personal data processed by Cheyne. You may be asked for information to confirm your identity and/or to assist Cheyne to locate the data you are seeking as part of Cheyne's response to your request. If you wish to exercise your right of access you should set out your request in writing to the Chief Financial Officer.

Finally, you have the right to raise any concerns about how your personal data is being processed with the Information Commissioner's Office (ICO) by going to the ICO's website: <https://ico.org.uk/concerns/> or contacting the ICO on 0303 123 1113 or casework@ico.org.