

Scope and overview

Stifel Nicolaus Europe Limited (SNEL) and its European affiliates, subsidiaries, and related entities (collectively, “Stifel,” “we,” “us,” or “our”) are committed to protecting personal data, which means any information relating to an identified or identifiable natural person (“data subject,” “you,” or “your”). This document, together with any other documents referenced, explains how we may collect, use, disclose, or otherwise process your data. This Notice applies to your data irrespective of whether we obtain it from you or another source. This Notice also describes certain rights you have regarding such data.

This Notice is addressed only to job candidates and employees. A separate disclosure addresses other data subjects. Here, the term *employee* encompasses *worker*, *contractor*, and any other similar role.

Who is responsible for your data?

For the purposes of applicable data protection laws, notably the General Data Protection Regulation (GDPR), including its variants like the UK GDPR and the EU GDPR, Stifel is a data controller with associated responsibilities for your data. SNEL is incorporated in England and Wales (No. 03719559) with its registered address as shown in the footer below. SNEL is authorised and regulated in the United Kingdom by the Financial Conduct Authority (FCA) (Registration Number 190412).

Collecting your data

- *How we collect it.* You may give us information by filling in forms online, by corresponding with us by phone, e-mail, in person, or otherwise. We may receive your data also from third parties.
- *Types of personal data.* We may collect the following data types, among others:
 - Name;
 - Home address;
 - Contact details (such as phone numbers and e-mail addresses);
 - Date of birth;
 - Bank details;
 - Gender;
 - Marital status;
 - Copies of your passport, driving licence, and similar documents;
 - Education history, training, and professional experience;
 - Current and past employment details;
 - Immigration status and work permits;
 - Languages spoken and level of proficiency;
 - Other information given in your CV.
- *Special categories of data.* We may collect, from you or a medical professional, the following data types, which needs more protection because it is deemed sensitive under the law:
 - Physical or mental health;
 - Racial or ethnic origin;
 - Political opinions;
 - Trade union membership;
 - Religious or philosophical beliefs;
 - Sex life;
 - Sexual orientation;
 - Genetic data; and
 - Biometric data (if used for identification).
- *Categories of third parties.* Below are the third parties from whom we may obtain your data.
 - External sources, such as those that are commercially available to us.
 - Recruitment agencies with whom you have registered an interest. Such parties support our recruitment processes under a duty of confidentiality.
 - Social networking sites, such as LinkedIn, Facebook, and Twitter.
 - Credit reference agencies, fraud prevention agencies, and referees.
- *Data relating to criminal convictions and offences.* We may collect and store such data but process it further only if necessary as follows:
 - To perform or exercise our or your obligations or rights under law; or
 - To prevent or detect an unlawful act and serves substantial public interest; or
 - In connection with actual or prospective legal proceedings or to obtain legal advice.

Using your data

We may process your data for the reasons below. Only the last one is relevant to special categories of data. The legal justification for our processing is, in each case, one or more of these reasons. Some of examples given may overlap, as there may be more than one reason for processing.

Where we have a legal or regulatory obligation: To comply with such obligations under certain UK or EU laws, we may process your data for the following purposes (where applicable):

- Preventing illegal working;
- Complying with health and safety obligations;
- Ensuring the safety and security of our systems;
- Carrying out equal opportunities monitoring;
- Responding to government statistical monitoring;
- Liaising with HMRC and other government entities or agencies in relation to attachments of earnings and similar deductions;
- Assessing Fitness and Propriety of individuals for regulatory purposes;
- Obtaining regulatory references; and
- Communicating with the PRA, FCA, or other public or regulatory bodies.

Where we have a legitimate interest: Data protection law allows us to process personal data where it is necessary for our legitimate interests. On that basis, we process your data for the following purposes:

- Recruitment (including negotiation and communicating with you about your application);
- Considering your suitability for employment/work, taking up references, and conducting appropriate checks;
- Dealing with any legal disputes involving you or other prospective, current, or former employees, workers, or contractors;
- Monitoring equal opportunities; and
- Reporting to government entities.

Special categories of personal data: We may process such data for the purposes below:

- Performing or exercising our or your obligations or rights under employment law or other laws, including for assessing suitability for particular jobs and considering whether adjustments may need to be made to accommodate an individual with a disability;
- Where it is in the public interest, such as for equal opportunities monitoring;
- Establishing, bringing, or defending legal claims; and
- In the case of information about your physical or mental health, to enable us to assess your working capacity and for occupational health purposes.

We may also process such data in other limited circumstances. We do not need your consent to process such data in circumstances where we already have a legal right to do so and we carry out such processing in accordance with this Notice. If we do ask you for your written consent, we will provide you with full details of the personal data we are seeking from you and the reason why.

Sharing your data

For the purposes set out in the section above, we may share your data with the third parties below:

- Our group companies;
- Professional advisors (including lawyers, accountants, and auditors);
- Legal and regulatory authorities, such as the PRA and FCA; and
- HM Revenue & Customs and other government/state-related entities.

We may also share your data with other parties that provide products or services to us, such as our pension provider, in order to enable us to comply with our overriding legal and regulatory obligations to you and to ensure that we comply with any contract that we enter into with you. Such third parties will be joint controllers and will process your data in accordance with their data privacy policy.

We may also disclose your data based on our legitimate interest, including for the reasons below:

- In the event we sell or buy any business or assets, in which case we may disclose your data to the prospective seller or buyer of such business or assets; or
- If we are under a duty to disclose or share your data to comply with any legal obligation.

Transferring your data to foreign destinations

Your data may be transferred to a foreign destination where it may be processed by staff working for our affiliates or suppliers. For all such transfers, we will ensure that your data is protected to comply with applicable domestic data protection laws. This can be done in a number of ways. For instance:

- The destination might be approved as an adequate jurisdiction under applicable domestic laws;
- The recipient might have signed up to a contract based on “model contractual clauses” approved under applicable domestic laws, obliging them to protect the data; or
- Where the recipient is located in the United States, it might be a participant in an appropriately approved certification scheme, such as the EU-US Data Privacy Framework (DPF), or its UK extension that establishes the UK-US data bridge.

Securing your data

We have implemented appropriate physical, technical, and organizational security measures designed to secure your data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access. We require our third-party service providers, by written contract, to implement appropriate security measures to protect your data consistent with our policies and any data security obligations applicable to us.

Retaining your data

How long we hold your data will vary. Except as otherwise permitted or required by applicable law, we will retain your data only for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for your data, we consider applicable legal requirements; the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorized use or disclosure of the data; the purposes we process the data for; and whether we can achieve those purposes in other ways.

Your rights

You have a number of legal rights in relation to your data we process. These rights include:

- The right to obtain information regarding our processing and access to the data;
- The right to withdraw your consent to our processing of the data at any time. Please note, however, that we may still be entitled to process the data if we have another legitimate reason;
- In some circumstances, the right to receive some 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 data you provided to us;
- The right to request that we rectify the data if it is inaccurate or incomplete;
- The right to request that we erase the data in certain circumstances. Please note that there may be circumstances where you ask us to erase the data but we are legally entitled to retain it; and
- The right to object to, and the right to request that we restrict, our processing of the data in certain circumstances. Under some circumstances, however, we might be legally entitled to continue processing notwithstanding your objection or restriction request.

If you think we have infringed any of your rights, you may lodge a complaint with the appropriate data protection regulator. If you are in the UK, please contact the Information Commissioner’s Office (ICO), or search their website at <https://ico.org.uk/>. If you are elsewhere in Europe, please contact the local data protection authority (DPA) or another supervising authority (SA) designated under local law.

Changes to this Notice

We reserve the right to update this Notice from time to time to reflect changes to the way we process your data or legal requirements. Whenever we update this Notice, we will post it on our website and/or, where appropriate, notify you by e-mail. Please check back frequently to see any updates to this Notice.

Contacting us

If you have any questions about this Notice, seek further details about any matter mentioned here, or want to exercise your rights listed earlier, please contact us by e-mailing EuropeDataOffice@stifel.com.