



TradingHub

Candidate Privacy Notice

Canada

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UNRESTRICTED



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TradingHub Canada Limited

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Date	User	Description of changes
July 2020	Legal	The Candidate Privacy Notice was newly created.
June 2021	Legal	Paragraph added to confirm that personal data may be transferred outside of Canada.
November 2021	Legal	Various amends were made to the Canadian Candidate Privacy Notice including: <ul style="list-style-type: none"><li data-bbox="767 1003 1321 1070">(a) adding additional wording to Section 8 (Right to Withdraw Consent); and<li data-bbox="767 1104 1326 1171">(b) making minor wording amendments to Section 9 (Contact).



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1. Introduction

TradingHub is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your candidacy and recruitment process with us, in accordance with the applicable privacy laws (“**Data Protection Law**”).

You are being provided with a copy of this privacy notice because you are applying to work for us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise and how long it will usually be retained for.

TradingHub will comply with Data Protection Law, which requires that the personal information we hold be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

2. Personal Data we hold about you

“Personal data” or “personal information” means any information about an individual from which that person can be identified. It does not include anonymous data (where the identity has been removed).

In connection with your application for work with us, we may collect, store, and use the following, but not limited to, categories of personal information about you:

- personal contact details such as name, title, address, telephone number and personal email address as provided in your curriculum vitae and covering letter;
- recruitment information (including references);
- information you have provided on an application form including date of birth, gender, employment history, qualifications etc;



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- any information you provide us during an interview; and
- CCTV footage and other information about access to our offices or systems obtained through electronic means (such as swipe card records).

We typically collect personal information about candidates through the following sources:

- you, the candidate, during the application and recruitment process;
- sometimes from an employment agency from which we collect the following categories of data: a curriculum vitae, agency candidate briefing notes, information you have provided on an application form including name, title, address, telephone number, personal email address, employment history, qualifications etc; and
- we may sometimes collect additional information from third parties including former named employers as referees where we collect your employment records and, where the information is a *bona fide* occupational requirement for the work or role, credit reference or other background checking agencies.

3. How we use Information About You

We will only use your personal information when we have a lawful purpose of doing so. Most commonly, we will use your personal information in the following circumstances:

- in assessing your skills, qualifications and suitability for the work or role as applicable; and
- where we need to comply with a legal obligation.

We may also use your personal information where we need to protect your interests (or someone else's interests) or where it is needed in the public interest, but these situations are likely to be rare.

The most common situations in which we will process personal information are listed below:

- making a decision about your recruitment or appointment;
- communicating with you about the recruitment process;
- keeping records relating to our hiring process;



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- complying with legal or regulatory requirements;
- determining the terms on which you work for us;
- checking you are legally entitled to work in Canada;
- business management and planning, including accounting and auditing;
- assessing qualifications for a particular job or task; and
- to prevent fraud.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose which we believe is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Having received your CV and covering letter or your application form, and the results from any test which we may ask you to take, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role or work. If we decide to offer you the role or work, we will then take up references and, if applicable, criminal record and other background checks.

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 will 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 will not be able to take your application further.

4. Data Sharing

We may have to share your data with third parties where required by law or where we have another legitimate interest in doing so. For example, we may share your data with third party service providers such as other entities in the TradingHub group or pre-employment screening service providers.



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All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may transfer your personal information anywhere our service providers or other entities in the group have operations. This may include jurisdictions outside of your home country. If we do, you can expect a similar degree of protection in respect of your personal information.

5. Data Security

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

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

6. Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. After such period, we will securely destroy your personal information in accordance with our data retention guidelines.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in the future and we may wish to consider you for that, we will write to you separately, seeking your consent to retain your personal information for a fixed period on that basis.



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7. Rights of Access, Correction, Erasure and Restriction

If you want to request to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer (“DPO”) in writing (contact details below).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Please note that your rights as described in this section are not absolute and may under certain circumstances be refused.

8. Right to Withdraw Consent

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Please note that if you withdraw consent for us to process your personal information, then we may be unable to progress your application further.

9. Contact

We have appointed a DPO to oversee compliance with this privacy notice. The DPO can be contacted if you have any questions about this privacy notice or how we handle your personal information. The DPO can be contacted at privacy@tradinghub.com or by mail to its registered office address.

10. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.