

Our Recruitment Privacy Notice

abrdn plc is committed to protecting your personal information.

In applying for a position within abrdn plc or a company within the abrdn plc group of companies (“the Company”; “us”; “we”), we wish to assure you that your personal information will be safeguarded and processed only where it’s lawful to do so in line with applicable privacy & data protection laws.

This Privacy Notice applies to all candidates applying for a position within the Company. It contains important information about what personal information we collect; how we use your personal information; who we may share it with and why; and your choices and rights when it comes to the personal information we process about you.

We may need to make changes to this Privacy Notice – the latest version will be made available on our recruitment site.

This version of the Privacy Notice was last updated in July 2021.

Who we are

abrdn plc is a FTSE 100 company, headquartered in Scotland employing c.6,000 individuals in over 50 locations globally. This Privacy Notice applies to those applying for employment by any company within abrdn plc (together “the company”).

How to contact us

If you have any questions about this Privacy Notice, or the information we collect or use about you, please contact:

FAO Data Protection Officer
abrdn plc
1 George Street,
Edinburgh,
EH2 2LL
Email: DPOffice@abrdn.com



Information we collect and use

Information about you that we collect and use during the application and recruitment process with the Company includes:

- Information about who you are e.g. your name, date of birth, address, contact details, gender, National Insurance number, passport and visa details
- information connected to your education e.g. qualifications and training records
- information about your previous employment history e.g. details of past employment (including start and end date, reasons for leaving, organisations you have worked for, roles held and references)
- information about your contact with us e.g. meetings, phone calls, emails / letters, interview comments and notes
- information collected when visiting any of our group offices e.g. visual images collected by closed circuit television (CCTV)
- information classified as 'sensitive' personal information e.g. relating to your health, immigration status, and information to support diversity within our company, such as ethnicity, sexual orientation or social mobility data. This information will only be collected and used where it's needed to provide or perform the contract of employment or to comply with our legal obligations, and where we have also obtained your explicit consent to process such information.

Where we collect your information

We may collect your personal information directly from you, from a variety of sources, including for example:

- an application for employment within the company
- phone conversations with us
- emails or letters between us
- interviews with our HR team and/or prospective manager(s)

We may also obtain personal information from third parties such as employment agencies, former employers and agencies we work with to conduct security and ID checks.

Why we collect and use your information

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so in line with applicable privacy and data protection laws. We will collect and use your information only if we are able to satisfy one of the lawful processing conditions set out in the data protection laws. This will be the case where:

- it's necessary to provide you with a contract of employment e.g. we will require some personal information including your name, address and date of birth
- it's necessary for us to meet our legal or regulatory obligations e.g. conducting the necessary checks to determine any criminal record / convictions which may impact fitness for propriety for employment



- it's in the legitimate interests of the Company e.g. for recruitment and succession planning. Where the processing is in pursuit of legitimate interests, we will always conduct an assessment to ensure that this use of your personal information is not excessive or unnecessary or otherwise more intrusive than it needs to be.
- You have given us your permission to use your information, for example, where you have not been successful in a particular role but we request to keep your information on our records so we can contact you about other potential opportunities that may arise. Or where you have voluntarily provided us with your diversity information.

We believe that creating a diverse and inclusive culture helps us deliver a great experience for our customers. We ask for your diversity information because we are committed to attracting, developing and retaining a broad mix of talent regardless of gender, ethnicity, gender identity, disability, marital or civil partner status, religion or belief, sexual orientation, age or social background. The provision of this information is voluntary and your decision to provide or withhold this information will not impact the outcome of your application; it will only be used for the purposes of diversity monitoring and will not be stored with your application.

Who we may share your information with and why

We may share your information with third parties for the reasons outlined above in 'Why we collect and use your information' and only where this is fair and lawful to do so.

We will share your information with:

- other parts of abrdn plc. who support us in the provision of services to our potential employees
- credit reference agencies for the purposes of conducting a credit check and ID verification
- companies we have chosen to support us in the recruitment process e.g. recruitment agencies and companies who help us in our contact with you, for example an internet service provider
- our regulators, including the Financial Conduct Authority or Prudential Regulation Authority, if required for the role you have applied for
- law enforcement and other appointed agencies who support us (or where they request the information) in the prevention and detection of crime

Before disclosing your personal information to such third parties we shall take appropriate steps to ensure that those persons are authorised to receive your information, will treat your personal information as confidential and that they will not use such information for any purposes other than within the scope specified by and / or agreed with the Company.



Where your information is processed

The majority of your personal information will be processed in the UK and / or the country in which you are employed by any Company within the abrdn plc group of companies. The Company is part of a global organisation and to ensure the provision of effective and efficient services and communication throughout our group, we may be required to transfer your data internationally (such as to our group companies in Europe, Asia-Pacific and North America) where necessary as part of the recruitment process. Whenever we require to transfer your personal information outside of your local country, we take additional steps to ensure this is in line with local laws and that your information is protected

How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by appropriate and reasonable security measures (including restricted access controls) to prevent unauthorised access to, or leakage, destruction or alteration of, your personal information. Our security controls are aligned to industry standards and good practice; providing an appropriate control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

How long we keep your information

If you are successful in your application and accept an offer of employment from us, we will continue to process your personal information in line with our obligations in relation to your contract of employment.

If you are unsuccessful in your application we shall retain your personal information for a period of 12 months from the date of advising that your application has been unsuccessful after which time it shall be erased.

Your rights

You have a number of rights under data protection laws which may be exercised in certain circumstances. These include:

Right to be informed about how and why we are processing personal information

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with - we do this in this Privacy Notice.

Right of access to personal information relating to you

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR).



Right to request recertification of inaccurate or incomplete personal information

If your personal information is inaccurate or incomplete, you can request that it is corrected.

Right to request erasure or your personal information

You can ask for your information to be deleted or removed if there is not a legal or regulatory obligation or other legitimate reason for the Company to continue to have it.

Right to withdraw consent

Where we process sensitive personal information with your explicit consent and you no longer wish us to collect and use your sensitive personal information you can withdraw consent at any time. Please note that the withdrawal of consent does not affect the lawfulness of the processing activities by the Company up to that point.

Right to restrict processing of your personal information

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information - but ensures that we don't use it in the future for those reasons you have restricted.

Right to data portability

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way.

Right to object to processing of your personal information

You can object to the Company processing your personal information where it's based on our legitimate interests (including profiling); for direct marketing (including profiling); and if we are using it for scientific / historical research and statistics.

Right to not be subject to automated decision making including profiling

You have the right to ask abrdn plc to:

- give you information about its processing of your personal information
- request human intervention or challenge a decision where processing is done solely by automated processes
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should.

You can exercise these rights by contacting DPOffice@abrdn.com

How to make a complaint

We will always strive to collect, use and safeguard your personal information in line with data protection laws and guidance. We take our obligations seriously and ask that any concerns are first brought to our attention, so that we can try to resolve these. If you do not believe we have handled your information as set out in our Privacy Notice, please let us know immediately (see 'How to contact us' above) as we will do our utmost to make things right.



While we hope that we can resolve any concerns with you, you do have the option to complain to your local personal data protection authority whether or not you have exhausted our internal procedure.

