



IIG Candidate Privacy Notice

What is the purpose of this document?

IIG Bank (Malta) Ltd (C 48767) of Level 20, Portomaso Business Tower, Portomaso, St. Julians STJ 4001, Malta (the “**Bank**”; “**we**”, “**us**” or “**our**”) is a “**data controller**”. This means that we are responsible for deciding how we hold and use personal information (i.e. “**personal data**”) about you. You are being sent a copy of this privacy notice (the “**Notice**”) because you are applying for work with 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. It provides you with certain information that must be provided under the Data Protection Act (Chapter 440 of the Laws of Malta) and the General Data Protection Regulation ((*EU*) 2016/679) (the “**GDPR**”), as may be amended.

Data protection principles

We will use all efforts to ensure and maintain compliance with applicable data protection laws and principles.

This means that your data will 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.
- Kept securely.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae (CV) and covering letter or email;
- A copy of your right to work documentation (where applicable);
- Your references; and
- Any information which you provide to us during an interview (which we will generally take down as part of our interview notes).

We may also collect, store and use the following “special categories” of more sensitive personal information:

- health issues that may affect your employment and any disability status that may require workplace adjustments;
- police conduct certificates.

How is your personal information collected?

We collect personal data about candidates from the following sources:

- You, the candidate.
- Recruitment agents that you may have provided your information to, with the purpose of these sharing the same information with us for job matching, and from whom we collect the following categories of data: candidate details (name and surname), CVs, work history, references and salary expectations;
- Background check providers and credit reference agencies;
- Your named referees;
- Your previous employers; and
- Professional networking sites (as publicly available sources), most commonly LinkedIn.



How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the job or role (as applicable).
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the job or role (as applicable) since such an appointment would be beneficial to our business.

We also need to process your personal information to decide whether to enter into a contract of employment or other working relationship with you.

Having received your CV and covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the job or role opening. If you do meet the basic requirements, we will decide whether your application is strong enough to invite you for an interview or a further interview, as the case may be. If we decide to do so, we will then use the information that you provide to us during the interview/s to decide whether to offer you the job or role (as applicable). If we decide to offer you the job or role, we will then take up references and require you to provide us with copies of qualification certificates, a clean police conduct certificate, a fit for work medical report, before confirming your appointment. If we then confirm your appointment, this documentation will be processed by the Bank in accordance with our Employer Privacy Notice, which will be provided to you at that point in time.

If you fail to provide personal information

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.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- A current and valid clean police conduct certificate must be provided in order for us to be in a position to confirm your appointment.
- We will use information about your health and disability status, if it is the case, to consider whether you are fit for the position and whether we need to provide appropriate adjustments during the recruitment process and thereafter if we offer the job.

Data sharing

When and why we may share your personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: any associated or affiliate company of the Bank and any recruitment agency from whom we may have received your candidate information (**job matching**). We require them to take appropriate security measures to protect your personal information in line with our policies. We do not allow them 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.

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, altered or disclosed. In addition, we limit access to your personal information to top-level management, designated HR personnel, your team leader or supervisor and strictly only 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. Details of these measures may be obtained from our data protection officer at dop@iigbank-malta.com.



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.

Data retention

For how long will we use your information for?

In the case of an unsuccessful application, we will retain your personal information for a period of a two (2) years after we have communicated to you our decision about whether to appoint you to the job or role (as applicable), unless legal proceedings are initiated (in which case we will need to retain the information until the conclusion and execution of the decision). We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If, however, you wish us to retain your personal information on file for a fixed period of three (3) years following an unsuccessful application, on the basis that a further opportunity may arise in the future or that we may decide to reconsider or revisit your application, you are kindly requested to provide your explicit request to our Data Protection Officer in writing via the following details dpo@iigbank-malta.com. In the absence of your request, we will not retain your personal information past the mentioned two-year period.

In the case of a successful application, this information will be processed as part of your employment or working relationship with us and its processing will be as detailed and described in our privacy notice for employees, workers and contractors which will be provided along with the Employment Contract.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You may send an email to dpo@iigbank-malta.com requesting information and a copy of the personal data about you which we process. You shall receive one copy, free of charge and via email, of your personal data which is undergoing processing by us. Any further copies shall incur a charge of € 10.00.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want 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 our data protection officer in writing, via the following details dpo@iigbank-malta.com.



Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal information, please contact the DPO on dpo@iigbank-malta.com. You have the right to lodge a complaint at any time to the competent supervisory authority in your jurisdiction on data protection matters. In the case of Malta, this is the Information and Data Protection Commissioner (“IDPC”) (<https://idpc.org.mt/en/Pages/Home.aspx>).

We would, however, appreciate the opportunity to deal with your concerns internally before you approach the supervisory authority, so please bring the matter to our attention at the first instance.

If you have any questions about this Notice, please contact our DPO at dpo@iigbank-malta.com.