

# Candidate Data Protection Notice

## Policy background

Data related to MUFG Investor Services provision of services is governed by multiple data protections regimes including:

- the EU General Data Protection Regulation (GDPR)
- the Irish Data Protection Acts 1988 to 2013 and 2018
- the UK Data Protection Act 2018
- the Data Protection (Jersey) Act 2018
- the Cyprus Law for the Protection of Natural Persons with regard to the Processing of their Personal Data and for the Free Movement of such Data (Law 125(I) of 2018)
- the Canadian Personal Information Protection and Electronic Documents Act, S.C. 2000 (PIPEDA) and the British Columbia Personal Information Protection Act SBC 2003 (PIPA BC)
- the Bermuda Personal Information Protection Act 2016
- the Cayman Islands Data Protection Act (2021 Revision)
- the Singapore Personal Data Protection Act (No. 26 of 2012)
- the Malaysia Personal Data Protection Act 2010 (PDPA)
- the Australia Privacy Act 1988 (Cth) ("Privacy Act")

together with all applicable secondary legislation, regulations and guidance as issued thereunder, and all above as amended, supplement and replaced ("Regulation")

Under Regulation you have a right to be informed about how and why we process your Personal Data.

This notice is being provided to you as required under Regulation and its purpose is to explain how MUFG Investor Services collects and uses Personal Data (as defined by the legislation in the applicable jurisdiction) about you and how you can contact us.

## Who we are

MUFG Investors Services is a service brand name and includes the following entities only within the MUFG global financial group - MUFG Fund Services (Bermuda) Limited, MUFG Fund Services Limited, MUFG Fund Services (Cayman) Limited, MUFG Alternative Fund Services (Cayman) Limited, MUFG Fund Services (Cyprus) Limited, MUFG Alternative Fund Services (Ireland) Limited, MUFG Alternative Fund Services (Jersey) Limited, MUFG Jersey Management Company Limited, MUFG Fund Services (Singapore) Pte Limited, MUFG Fund Services (Canada) Limited Canada, MUFG Fund Services (UK) Ltd., MUFG Fund Services (Hong Kong) Ltd., MUFG Fund Services (Cayman) 2 Limited, MUFG Fund Services (Australia) Pty Ltd and MUFG Investor Services (Malaysia) SDN BHD.

MUFG Investor Services, provides fund administration and investor services. As a potential employer we need to hold and process your Personal Data for recruitment purposes if you apply directly, or indirectly through an agency, for a permanent or temporary position with us.

We will collect and process Personal Data from you during the recruitment process.

## Personal Data we process

The Personal Data we process is normally obtained directly from you through our recruitment portal or from a recruitment agency.

In certain circumstances, we may obtain Personal Data from internal third parties e.g., employees and managers who have referred you for a role, from third party recruiting or staffing agencies you engaged,

from third party background, employment or reference check providers, or from publicly available sources, such as national authorities or LinkedIn.

We will collect, use, process, transfer, and store your Personal Data only in a manner permitted or required by law or under Regulation, such as when necessary to carry out our application and recruitment process, to comply with a legal obligation that applies to us, or where we have a legitimate interest.

Where we obtain your Personal Data	Why we process your Personal Data	
<p><b>From you:</b></p> <ul style="list-style-type: none"> <li>• <b>Special categories (“Sensitive” categories):</b> Health information (including disability, if disclosed), religion, ethnicity</li> <li>• <b>Identity and contact information:</b> Name, gender identity, date and place of birth, nationality, postal address, registered address, legal domicile, email address, telephone numbers, signature, passport number</li> <li>• <b>Financial details / circumstances:</b> Bank account details (if approved expenses are to be claimed. i.e., when approved for the Candidate to attend an interview), remuneration</li> <li>• <b>Work details:</b> Department, role / title, employee number, educational history and professional career and qualifications, date joined / left the company, visa/work permit details</li> </ul>	<p>Because we have a <b>legitimate interest</b> to:</p> <p>Because you have provided us your <b>consent</b> to:</p>	<ul style="list-style-type: none"> <li>• Identify and evaluate job applicants, including to assess skills, qualifications, and interests</li> <li>• Communicate with you about the recruitment process, your application, and any questions you direct to us</li> <li>• Where your role isn’t a regulated one, verify your information and carry out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.</li> <li>• Analyse and improve our application and recruitment process.</li> <li>• Provide you with reasonable accommodations, if such a request is made</li> <li>• Support our Diversity, Equity, Inclusion &amp; Belonging (DEIB) Program, specifically to collect and report on diversity data and create initiatives to improve the program and create an inclusive work environment</li> </ul>
<p><b>From you, background /employment /reference check providers or recruitment or staffing agencies or portals:</b></p> <ul style="list-style-type: none"> <li>• <b>Identity and contact information:</b> Name, gender, date of birth, nationality, postal address, registered address, email address, telephone numbers</li> <li>• <b>Special categories (“Sensitive” categories):</b> Sanction screening and adverse media searches</li> </ul>	<p>Because we have <b>legal / regulatory obligations</b> to:</p>	<ul style="list-style-type: none"> <li>• For regulated roles, verify your information and carry out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law</li> <li>• Keep records related to our hiring processes.</li> <li>• Create and submit reports as required by applicable laws or regulations</li> <li>• Comply with applicable laws, regulations, legal processes, or enforceable government requests</li> </ul>

<ul style="list-style-type: none"> <li>• <b>Work details:</b> Educational history and professional career and qualifications, right to work</li> </ul>		
<p><b>From internal third parties:</b></p> <p>This includes Personal Data obtained from individuals (such as employees or managers) who may have referred you for a position at MUFG Investor Services.</p>	<p>EEA, Singapore:</p> <p><b>Legitimate interest</b> Other jurisdictions: As authorized by law or, where consent is required, the internal referrer must certify that you have provided your explicit consent for the processing of your Personal Data for the purpose of exploring professional opportunities at MUFG.</p>	<ul style="list-style-type: none"> <li>• Contact you for the purpose of discussing employment opportunities at MUFG</li> </ul>
<p><b>From publicly available sources:</b></p> <p>This includes Personal Data obtained from national authorities and LinkedIn.</p>	<p>Because we are <b>legally allowed</b> to process publicly available Personal Data</p>	<ul style="list-style-type: none"> <li>• Contact you for the purpose of discussing employment opportunities at MUFG</li> <li>• Contact national authorities to verify educational or certification/qualifications</li> </ul>
<p>Other:</p> <ul style="list-style-type: none"> <li>• Telephone and image recordings</li> <li>• CCTV at our premises</li> </ul>		

You will not be subject to hiring decisions based solely on automated data processing. While artificial intelligence will be used to provide a comparison of the job skill requirements to the Candidates' skill levels, no automated decision making is based on this comparison as outputs derived from the use of artificial intelligence will always be reviewed by our Human Resources Department.

We have legal and regulatory requirements to process your Personal Data to facilitate the exercise of your rights or other individuals' rights pertaining to data protection; this will include not only the communication process but also the subsequent processing of Personal Data as required to solve Data Subject requests as allowed by law or regulation.

Any Personal Data provided to us will only be used for the purposes for which it was intended and any reasonably related purposes.

### **How we share your Personal Data**

Your Personal Data may be disclosed to third parties where we are legally obliged to do so.

Where allowed, MUFG Investor Services may provide your details to the parent company and other group affiliates as may be required from time to time.

Should you be required to communicate with third parties due to your job application or related processes, we will provide Personal Data about you to such parties.

Our service providers include information technology and telecommunication service providers, CCTV providers, software support and development contractors, computer maintenance contractors, printing companies, document storage and destruction companies, archiving services providers, auditors, consultants, legal advisors, Sanctions & PEP screening application support services, employee management services (including background check services), recruitment services, survey services, training and development services, travel agencies and, visa application services.

Where necessary your Personal Data will be made available to statutory and regulatory bodies.

### **Countries your data may be transferred to**

Personal data may be transferred to entities located in non-EEA countries or regions including Japan, UK, Jersey, Cayman Islands, Bermuda, Hong Kong, Singapore, USA and Canada.

Prior to undertaking any such transfers the company ensures it has adequate safeguards in place such as Intra-Group processing agreements and Standard Contractual Clauses.

### **Retention period or criteria used to determine the retention period**

Your Personal Data will be kept for the duration required to fulfil its purpose and any regulatory or legal retention requirements.

### **Security Measures we have in place**

We know that you are concerned about the security of your Personal Data. This is why we endeavor to use industry standard security measures to protect your Personal Data and to prevent the loss, misuse or alteration of any Personal Data in our control. However, the transmission of information via the internet is not completely secure and we cannot guarantee that all your private communications and other personally identifiable information will never be disclosed once it leaves our network. We are continuously improving our information security posture.

All staff complete data protection training annually. In addition, targeted training and awareness exercises are provided from time to time.

### **Your Rights**

You have a number of rights in relation to Your Personal Data, called Data Subject Rights. These rights are not absolute and are subject to certain exceptions or qualifications depending on the circumstances.

#### **Right of Access to Your Personal Data**

You have a right to access the Personal Data We process on You. We will endeavour to give You as much information as possible, but We can't provide You with information about another person. If there is any specific information You are looking for, please outline this in Your request.

#### **Right to Correct Your Personal Data**

If any of the Personal Data We hold about You is incorrect, incomplete or out of date, You have a right to have Your Personal Data corrected.

#### **Right to Object to the Processing of Your Personal Data**

You have the right to object to certain types of Processing of Your Personal Data. If You object to the Processing of Your Personal Data, We will review Your objection in the context of the Personal Data We process about You. If We consider that we can demonstrate compelling legitimate grounds for the Processing which may override Your individual objection we may continue to process Your Personal Data despite Your objection. If We feel we cannot demonstrate compelling legitimate grounds for the Processing, We will stop Processing Your Personal Data.

#### **Right to Erase Your Personal Data**

You can ask us to erase Your Personal Data if You think that Your Personal Data is Processed without a legitimate reason or where You believe We no longer have grounds to process Your Personal Data. Please note that We cannot erase Your Personal Data if doing so prevents Us from meeting Our legal and regulatory obligations.

#### **Right to Not Have Your Personal Data Used for Direct Marketing**

You have the right to not be subject to direct marketing, and we will only use Your Personal Data for direct marketing purposes if You have given Us Your consent. You can withdraw Your consent at any time by clicking on the “unsubscribe” button in the bottom of marketing emails.

#### **Right to Withdraw Consent**

You have the right to withdraw Your consent to Our Processing of Your Personal Data. If You do so and We have no other legal justification for continuing to Process Your Personal Data, We will stop Processing Your Personal Data. There will be no consequences to You if You withdraw Your consent other than if We have to stop Processing Your Personal Data and We can no longer provide services to, or engage with, You as a result.

#### **Complain to the Supervisory Authority**

You have a right to complain to the relevant Supervisory Authority. This is the authority responsible for supervising data protection law and compliance in the jurisdiction You reside in.

### **How to contact us**

You can contact us in relation to any queries or questions you may have in relation to Personal Data as follows:

#### **By e-mail**

[dataprotectionoffice@mfsadmin.com](mailto:dataprotectionoffice@mfsadmin.com)

#### **By Post**

Contact details for our office locations can be found [here](#).

The Data Controller is the subsidiary of MUFG Investor Services Holdings Limited with whom you are engaging with.

The nominated representative for each entity outside the EU is MUFG Alternative Fund Services (Ireland) Limited.

This data protection notice will be reviewed from time to time to take into account changes in the law and user experience.