

RBC JOB APPLICANT PRIVACY NOTICE

1. INTRODUCTION

RBC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you and for what purposes. You are being presented with a copy of this privacy notice because you are applying for work with us (whether as an employee or contractor). This notice informs you what information we will collect about you and how we will use it, in relation to the purposes of the recruitment exercise. It will also inform you how long your data will usually be retained for and provides you with certain other information that must be provided under the General Data Protection Regulation (GDPR) or any other applicable European data protection law.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law. This means that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

The RBC company that you are applying to is responsible for your personal data. The address and contact details of the RBC companies that you are applying to can be found in the appendix 1.

4. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

In connection with your application for work, RBC will collect and create personal data about you during the course of your application with RBC. Personal data is data from which you can be identified. This includes:

- (a) *Contact details* - your home address, email address and phone numbers;
- (b) *Recruitment information* - your CV, employment history, educational history, professional qualifications, interview notes, selection and verification data and correspondence with RBC or its recruiters with regard to job applications (including references) and any information you provide during an interview;
- (c) *Sensitive personal information* – for example health information, including any medical conditions, health and sickness records and information necessary to perform appropriate background checks, including information about criminal convictions and offences.

5. HOW DO WE OBTAIN YOUR PERSONAL DATA?

Depending on the role we collect personal information about candidates from the following sources as appropriate:

- You, the candidate.
- Recruitment agency.
- Background check provider
- Credit reference agency
- Your named referees.

6. HOW DO WE USE YOUR PERSONAL DATA?

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

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

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business.

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

Having received your CV, covering letter or your application, we will 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. If we decide to offer you the role, we will then take up references and may carry out a criminal record check or carry out a background check before confirming your appointment.

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. 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.

Sensitive Personal Information

We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

Information about criminal convictions

If we decide to offer you a role (conditional on checks and any other conditions, such as references, being satisfactory) it may be necessary to collect information about your criminal convictions history. In certain instances, we are entitled to carry out criminal records checks, by law, in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

7. ON WHAT LEGAL BASIS DO WE PROCESS PERSONAL DATA ?

We use your personal data on the following basis:

- (a) in order to process your application for employment, enter into an employment or other engagement agreement with you and perform that agreement;
- (b) in order to comply with our legal obligations and for the establishment, exercise or defence of legal claims or proceedings;
- (c) for reasons of substantial public interest;
- (d) for our legitimate business interests as described in Section 6 above;
- (e) where the processing of personal data is required for health and safety purposes, in order to protect your vital interests; and
- (f) where we have obtained your consent to specific processing of your personal data, on the basis of that consent. In those circumstances, you may withdraw this consent at any time.

8. HOW LONG DO WE RETAIN YOUR PERSONAL DATA FOR THIS PURPOSE?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will always keep your personal data for the period required by law. We will also keep your personal data where we need to do so in connection with legal action or an investigation involving RBC. Otherwise, we keep your personal data for the period necessary to fulfil the purposes outlined in Section 6 above. After this period, we will securely destroy your personal information in accordance with our data retention policy.

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

9. WHO HAS ACCESS TO YOUR PERSONAL DATA?

9.1 Access to your personal data within RBC

Due to the global nature of our operations, RBC needs to be able to move personal data across our organisation. We share certain of your personal data with parties who have a legitimate and justifiable reason to view such data only, including:

- members of the RBC group of companies; and
- personnel and other departments throughout RBC, including Human Resources, Legal, Technology Services, Security, Accounting.

9.2 Access to your personal data by third parties

We will only share your personal information with third parties where required by law or for the purposes of processing your application (for example background check providers, credit agencies, etc.).

When a third party processes your personal data solely following RBC's instructions, it acts as a data processor. We enter into an agreement with such a data processor concerning the processing of personal data which imposes obligations on the processor to safeguard your personal data.

10. HOW IS YOUR PERSONAL DATA SECURED?

RBC has taken adequate safeguards to ensure the confidentiality and security of your personal data. RBC has implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, and against all other forms of unlawful processing (including, but not limited, to unnecessary collection) or further processing.

We may transfer the personal information we collect about you outside the EU. However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- in the case of transfer of personal information outside the EEA, entering into EU Standard Contractual Clauses with such company;
- ensuring that the jurisdictions into which personal information is transferred contain equivalent data protection legislation and requirements to those of the EU (examples include Jersey, Guernsey, and Canada); and
- in the case of transfer of personal information to certain third parties in the United States of America, obtaining certification under the EU-US Privacy Shield.

11. 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.
- 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).
- 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.

LEGALLY PRIVILEGED & CONFIDENTIAL

- 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.

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.

You can request access, correction, restriction, portability or removal of the data that RBC processes about you at any time by sending a request to: **DPO@RBC.com**.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Right to withdraw consent

In applying for this role, where you have provided us consent to process your personal information for the purposes of the recruitment exercise, you have the right to withdraw your consent at any time. To withdraw your consent, please contact DPO@RBC.com. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely. Please also note that you can withdraw your application any time.

We have appointed a data protection officer (DPO) to oversee compliance with this privacy statement. If you have any questions about this Privacy Statement or how we handle your personal information, please contact the DPO at DPO@RBC.com. You have the right to make a complaint at any time to your local supervisory authority for data protection issues. The list of these local supervisory authorities can be found in the appendix 2.

Appendix 1 - RBC LEGAL ENTITIES

Belgium

RBC INVESTOR SERVICES BELGIUM S.A.

37, Boulevard Du Roi Albert II,
Schaerbeek, B-1030
Belgium

France

RBC INVESTOR SERVICES BANK FRANCE S.A.

105, rue Réaumur
Paris, F-75002
France

RBC INVESTOR SERVICES FRANCE S.A.

105, rue Réaumur
Paris, F-75002
France

RBC EUROPE LIMITED S.A.R.L.

55, avenue Hoche
Paris, F-75008
France

RBC Paris Branch Administrative Support

55, avenue Hoche
Paris, F-75008
France

Germany

RBC EUROPE LIMITED – Frankfurt Branch

Taunusanlage 15,
Frankfurt am Main, 60325
Germany

RBC CAPITAL MARKET (EUROPE) GMBH

Taunusanlage 15,
Frankfurt am Main, 60325
Germany

RBC VERWALTUNGSGESCHELLSCHAFT AG

Marie-Curie-Str. 30,
Frankfurt am Main, 60439
Germany

Guernsey

RBC SERVICES (CHANNEL ISLANDS) LIMITED

Gaspé House, 66-72 Esplanade
St. Helier, JE2 3QT
Jersey
Channel Islands

Ireland

RBC INVESTOR SERVICES IRELAND LIMITED

4th Floor, One George's Quay Plaza
George's Quay 2,
Dublin
Ireland

RBC INVESTOR SERVICES BANK S.A., DUBLIN BRANCH

4th Floor, One George's Quay Plaza
George's Quay 2,
Dublin
Ireland

Italy

RBC INVESTOR SERVICES BANK S.A. - Succursale di Milano

Via Vittor Pisani, 26,
Milan, 20124
Italy

Jersey

RBC SERVICES (CHANNEL ISLANDS) LIMITED

Gaspé House, 66-72 Esplanade
St. Helier, JE2 3QT
Jersey
Channel Islands

Luxembourg

RBC CAPITAL MARKETS ARBITRAGE S.A.

16, rue Notre Dame
Luxembourg, L-2240
Grand Duchy of Luxembourg

RBC FINANCE (Luxembourg) S.A R.L.

16, rue Notre Dame
Luxembourg, L-2240
Grand Duchy of Luxembourg

RBC FINANCE (Luxembourg) 1864 S.A R.L.

16, rue Notre Dame
Luxembourg, L-2240
Grand Duchy of Luxembourg

RBC FINANCE (Luxembourg) 2018 S.A R.L.

16, rue Notre Dame
Luxembourg, L-2240
Grand Duchy of Luxembourg

RBC FINANCE S.A R.L./B.V.

16, rue Notre Dame
Luxembourg, L-2240
Grand Duchy of Luxembourg

RBC HOLDINGS (GERMANY) S.A R.L.

16, rue Notre Dame
L-2240, Luxembourg
Grand Duchy of Luxembourg

RBC HOLDINGS (LUXEMBOURG) S.A R.L.

16, rue Notre Dame
Luxembourg, L-2240
Grand Duchy of Luxembourg

RBC INVESTOR SERVICES BANK S.A.

14, Porte de France
Esch-sur-Alzette, L-4360
Grand Duchy of Luxembourg

RBC LUXEMBOURG (SUISSE) HOLDINGS S.A.R.L.

16, rue Notre Dame
Luxembourg, L-2240
Grand Duchy of Luxembourg

Spain

RBC EUROPE LIMITED – Madrid Branch

Calle de Serrano, 1
Madrid, 28001
Spain

Switzerland

RBC INVESTOR SERVICES BANK S.A. - Esch-sur-Alzette, Zurich Branch

Bleicherweg 7,
Zurich, CH-8027
Switzerland

RBC EUROPE LIMITED – Lausanne Branch

20, rue du Bourg
Lausanne, CH-1002
Switzerland

RBC EUROPE LIMITED – Lugano Branch

14, Corso Elvezia
Lugano, CH-6901
Switzerland

United Kingdom

RBC EUROPE LIMITED

Riverbank House, 2 Swan Lane
London, EC4R 3BF

ROYAL BANK OF CANADA (London Branch)

Riverbank House, 2 Swan Lane
London, EC4R 3BF

RBC INVESTOR SERVICES TRUST

Riverbank House, 2 Swan Lane
London, EC4R 3BF

RBC INVESTOR SERVICES Bank – London Branch

Riverbank House, 2 Swan Lane
London, EC4R 3BF

Appendix 2 - DATA PROTECTION AUTHORITIES

Belgium

Commission de la protection de la vie privée

Rue de la Presse 35
1000 Bruxelles
Tel. +32 2 274 48 00
Fax +32 2 274 48 10
e-mail: commission@privacycommission.be
Website: <http://www.privacycommission.be/>

France

Commission Nationale de l'Informatique et des Libertés - CNIL

8 rue Vivienne, CS 30223
F-75002 Paris, Cedex 02
Tel. +33 1 53 73 22 22
Fax +33 1 53 73 22 00
e-mail:
Website: <http://www.cnil.fr/>

Germany

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit

Husarenstraße 30
53117 Bonn
Tel. +49 228 997799 0; +49 228 81995 0
Fax +49 228 997799 550; +49 228 81995 550
e-mail: poststelle@bfdi.bund.de
Website: <http://www.bfdi.bund.de/>

Guernsey

Office of the Data Protection Commissioner

North Esplanade, St Peter Port
Guernsey GY1 2LQ
Tel. +44 1481 742074
e-mail: enquiries@dataci.org
Website: <https://dataci.gg/>

Ireland

Data Protection Commissioner

Canal House
Station Road
Portarlinton
Co. Laois
Lo-Call: 1890 25 22 31
Tel. +353 57 868 4800
Fax +353 57 868 4757
e-mail: info@dataprotection.ie
Website: <http://www.dataprotection.ie/>

Italy

Garante per la protezione dei dati personali

Piazza di Monte Citorio, 121
00186 Roma
Tel. +39 06 69677 1
Fax +39 06 69677 785
e-mail: garante@garanteprivacy.it
Website: <http://www.garanteprivacy.it/>

Jersey

Office of the Information Commissioner

Brunel House, Old Street
St Helier, Jersey JE2 3RG
Tel. +44 1534 716530
e-mail: enquiries@oicjersey.org
Website: <https://oicjersey.org/>

Luxembourg

Commission Nationale pour la Protection des Données

1, avenue du Rock'n'Roll
L-4361 Esch-sur-Alzette
Tel. +352 2610 60 1
Fax +352 2610 60 29
e-mail: info@cnpd.lu
Website: <http://www.cnpd.lu/>

Spain

Agencia de Protección de Datos

C/Jorge Juan, 6
28001 Madrid
Tel. +34 91399 6200
Fax +34 91455 5699
e-mail: internacional@agpd.es
Website: <https://www.agpd.es/>

Switzerland

Eidg. Datenschutz- und Öffentlichkeitsbeauftragter

Feldeggstrasse 1
CH-3003 Bern
Tel. +41 (0)58 462 43 95 (mon.-fr., 10-12am)
e-mail: <https://www.edoeb.admin.ch/edoeb/de/home/der-edoeb/kontakt/kontaktformular.html>
Website: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact/address.html>

United Kingdom

The Information Commissioner's Office

Water Lane, Wycliffe House

Wilmslow - Cheshire SK9 5AF

Tel. +44 1625 545 745

e-mail: international.team@ico.org.uk

Website: <https://ico.org.uk>

DOCUMENT HISTORY AND DESCRIPTION OF MOST RECENT CHANGES

May 24th 2018

First publication of the Job Applicant Privacy Notice.

June yy 2018 revision:

This revision does not introduce material changes to the essence of this Job Applicant Privacy Notice. The following revisions were made:

- Update of the list of RBC legal entities in Appendix 1