



PRIVACY NOTICE

Candidates

Effective Date: May 2018

Data Controller

Small World Financial Services Group Ltd.

Small World Group FS Group Ltd (“Small World”) incorporates, among others, the following European legal entities:

1. LCC Trans-Sending Ltd (including branches incorporated in Ireland, Germany, Netherlands & Italy)
2. LCC Trans-Envio SPRL
3. Swiss Transfers GmbH
4. Small World FS, Ireland Ltd
5. Small World FS Norway AS
6. Small World FS, Spain SAU
7. Small World FS, Sweden AB
8. Small World Financial Services Spain S.A.
9. Small World Exchange Services, SLU
10. Trans-Envio, Agencia de Cambios, Unipessoal LDA

As part of complying with the European General Data Protection Regulation (GDPR) Small World publishes this Privacy Notice which details how, why and for how long personal information is collected and handled in the European Economic Area.

This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment, and occasional recruiting programs and events run by Small World.

How Small World collect your information

Small World collects personal information about you from a variety of sources including but not limited to those detailed below. You agree to the processing of this information for the purposes and ways described in this privacy notice including the transfer of your personal information outside of the European Economic Area.

In accordance with Article 6 GDPR, Small World will only collect and process personal data about you where we have a lawful basis to do so. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you) and the “legitimate interests” of Small World.



Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object.

By submitting your personal data to us as part of your job application, you acknowledge that:

- You have read and understood this Privacy Notice.
- Your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice.
- You are not required to provide any requested information to us, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing inaccurate information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by Small World or any of its group companies

We may collect personal information about you from a variety of third party sources such as government agencies and consumer and credit reporting agencies and other suppliers of information to assist us in protecting our legitimate business interests.

We may collect personal information when we are required to do so by law and as part of compliance programmes, in particular those related to anti-money laundering and preventing criminal and fraudulent activity

When you submit an application for employment through our website, we collect personal information about the domain and host from which you access the Internet, your computer's IP address, browser and operating system software, the date and time you access our website and the address of the site from which you linked to our website when you visit us.

We also collect personal information on your online activity as described in the paragraph below titled "COOKIES AND INTERNET TECHNOLOGY".

The personal information we collect includes, but is not limited to, name, address, and telephone number, information about the form of identification used to verify your



identity & your right to employment (including a copy of the identification document) and details of your career history.

If you apply through a third party recruitment website (eg Indeed, Monster etc.), you should refer to their Privacy policy to understand the personal data that they will collect and how they will use it when you use their site.

If you have any questions about the lawful basis upon which we collect and how we use your personal data, please contact our Data Protection Officer (DPO@smallworldfs.com).

Why Small World collects your information

The type of personal data that we request from you and the ways that we process it are determined by the requirements of the country in which the position is located, and not the country in which you reside. Should you apply to more than one location or should the role to which you apply be available in more than one country, the types of personal data we request from you and the ways that we process it are determined by the requirements of the country in which the specific position is located.

We use the personal information we obtain about candidates for legitimate HR and business management reasons including:

- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- recordkeeping in relation to recruiting and hiring;
- ensuring compliance with legal requirements, including evidencing that we have complied with local right to work checks, diversity and inclusion requirements and practices;
- conducting pre-employment checks for anti-money laundering purposes including checking candidates against relevant sanctions lists, and completing credit & criminal record checks where required and where permissible by law. Such checks will only be initiated if you are offered a role with Small World.
- protecting our legal rights to the extent authorised or permitted by law;

We may also analyse your personal data or aggregated/pseudonymised data to improve our recruitment and hiring process and augment our ability to attract successful candidates.

Information Small World disclose

We may disclose personal information to the following Small World group companies including, but not limited to,

- LCC Trans-Sending Ltd (including branches incorporated in Ireland, Germany, Netherlands & Italy)
- LCC Trans-Envio SPRL



- Choice Money Transfer Inc
- Choice Money Transfer (Canada) Ltd
- Swiss Transfers GmbH
- Small World FS, Africa SA
- Small World FS, Ireland Ltd
- Small World FS Norway AS
- Small World FS, Spain SAU
- Small World FS, Sweden AB
- SW Brasil Services Financeiros e Turismo Ltda
- Small World Exchange Services, SLU
- Small World Financial Services Spain SATrans-Envio, Agencia de Cambios, Unipessoal LDA

We may also share your data with companies which help us conduct recruitment campaigns and whom source candidates on our behalf. In such instances, we will only share data related to candidates that the recruitment firm have provided to us as part of a campaign;

We may also share your data with third parties engaged to assist us in meeting our obligations under anti-money laundering legislation.

Small World and our affiliates worldwide may disclose your personal information, including, but not limited to, your name, address, and employment details, (i) if we are required to do so by domestic or foreign law or legal process or (ii) to law enforcement authorities or other government officials (including those in this country, the United States or elsewhere) for purposes such as detecting, investigating, prosecuting and preventing crimes, including money laundering and related criminal activity, and the recipients may further disclose the personal information for these and other related purposes.

How long Small World will keep your information

We will keep your personal data for as long as we have a relationship with you. Once our relationship with you has come to an end (e.g. your application for employment has been concluded and has not resulted in an accepted offer of employment or, following an accepted offer, your employment with the group has been terminated for whatever reason), we will only retain your personal data for a period of time that is calculated depending on the type of personal data, and the purposes for which we hold that information.

We will only retain information that enables us to:

- Maintain recruitment records for analysis and/or audit purposes;



- Comply with record retention requirements under the law (for example, as required under legislation concerning the prevention, detection and investigation of illegal working);
- Defend any existing or potential legal claims;

The retention period is often linked to the amount of time available to bring a legal claim, which is determined by local legislation. We will retain your personal data after this time if we are required to do so to comply with the law. If there are outstanding claims or complaints that will reasonably require your personal data to be retained, or for regulatory or technical reasons we will continue to make sure your privacy is protected.

Your rights

The right to access information we hold on you

At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we got the information. This is known as a Subject Access Request

Once we have received your request we will respond within 30 days. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee of £25 per request. In order to process your request Small World may need to verify you identify for your security. In such cases your response will be necessary for you to exercise this right.

The right to correct and update the information we hold on you

If the data we hold on you is out of data incomplete or incorrect, you can inform Small World and it be shall be updated. In order to process your request Small World may need to verify your identify for your security. In such cases your response will be necessary for you to exercise this right.

The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted. In order to process your request Small World may need to verify your identify for your security. In such cases your response will be necessary for you to exercise this right.

The right to object to processing of your data

You have to right to request that Small World stops processing your data.

Upon receiving the request we will contact you to inform you if we are able to comply or if we have legitimate grounds to continue.



If your data is no longer processed Small World may continue to hold your data to comply with your other rights. In order to process your request Small World may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

Consent

In such cases that we need your consent to hold your information Small World will ask you to check a box on any form requiring consent. By checking these boxes you are stating that you are informed of why Small World is collecting the information, how they will use it, how long they keep it for, who else will have access to it and what your rights are as a data subject.

Sharing your information

Where necessary to fulfil our obligations to you, Small World may pass your details to third parties including SWFS Group affiliated entities, and companies engaged by Small World to meet their obligations such as (but not limited to) Money Laundering and Terrorism Financing. If you have applied for a role with us through a third party recruitment firm or headhunter, we will share details about your application with the recruitment firm.

COOKIES & INTERNET TECHNOLOGY

We use Internet technologies like cookies for a variety of purposes, including, but not limited to, those identified below.

- To assist us in providing services to you;
- To allow you to change webpages during your visit without having to re-enter your password;
- To temporarily track activity on our website;
- To determine whether you came to our site from a banner ad or an Affiliate website;
- To deliver information specific to your interests on additional websites; or
- To identify you when you visit the website, to personalize the content of the website for you and to assist you in carrying out transactions and accessing account information.

Small World has implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level, (note: cookies set prior to you changing your preference level are maintained on your computer. To remove them please refer to your browser settings). If your browser does not support JavaScript you can find out about the cookies used on our sites and can only manage the use of cookies through your web browser settings. Please note that if you



disable all cookies on your browser, this will limit the features of this site and may impact the ability to complete your transaction.

For more information on how Small World uses cookies please go to <https://www.smallworldfs.com/small-world/esp/en-gb/cookies-policy>

COMPLAINTS

If you have concerns about how we have handled your data, please contact us by emailing the Data Protection Officer DPO@smallworldfs.com outlining your concerns.

If you remain unsatisfied with our response, and wish to lodge a complaint through your local Data Protection Authority, please check the following link to access European Data Protection Authorities http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

Contact details

If you have any queries about this notice, need further information or wish to lodge a complaint you can use the details below to contact the relevant party.

Group Data Protection Officer/Data Compliance Contact

Mariano Ciriotti

DPO@smallworldfs.com

Paseo del Club Deportivo 1, Edificio 13
Pozuelo de Alarcón, Madrid – Spain (28223)

Data Controller

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London, SE1 7 HB, United Kingdom