

COWEN

Candidate Privacy Notice

Cowen International Limited
Cowen Execution Services Limited

January 2023

Candidate Privacy Notice

This Privacy Notice (the **Privacy Notice**) provides information on how and why we collect and use your Personal Data (any information relating to an identified or identifiable individual) during and after the recruitment process when you apply for a position either directly or indirectly (e.g., through recruitment agencies) with Cowen Execution Services Limited and Cowen International Limited (both together and individually, the Company).

This Privacy Notice is updated as of January 2023. We may update this notice from time to time and the most recent version of this notice will be available on our [website](#).

WHEN DOES THIS PRIVACY NOTICE APPLY?

This Privacy Notice is applicable to the processing by the Company of all Personal Data of candidates, job applicants and former candidates of Cowen Inc. (the **Candidate** or **you** or similar pronouns), collected during and after the recruitment process in accordance with Privacy and Data Protection Laws. [If you are a Californian resident, please refer to our [Californian Residents Privacy Notice.](#)]

WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

The Company acts as the controller for the processing of your Personal Data. This Privacy Notice indicates what Candidate Personal Data are processed by Company and for what purpose, and to which persons or entities the data will or may be provided.

Any question or query regarding the processing of your data may be addressed according to section "QUESTIONS OR REQUESTS FOR ACCESS, CORRECTION AND REMOVAL?".

WHAT PERSONAL DATA IS PROCESSED?

We collect and maintain information that is provided and obtained during the application, interview and recruitment process in respect of Candidates, including the following categories of data:

- information received when performing background checks (including CV, experience, references, professional memberships and qualifications, background vetting information);
- identification data and personal contact details (e.g., name, e-mail, postal address, telephone number, country of residence, drivers' licence, passport, copies of identification documents);
- personal characteristics (e.g., gender, date of birth, marital status);
- results of personality tests;
- information provided by you during an interview to discuss your application (including by phone or video call);
- financial and banking information (pre-employment vetting and payroll records) if you accept a role with us;
- positions of authorities in other companies, secondary employment or conflicts of interest (e.g., directorships, trusteeships);
- special categories of data (e.g., health data, diversity data, criminal records, but only processed as permitted by Privacy and Data Protection law).

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WHERE WE WILL COLLECT YOUR DATA FROM

Most of the Personal Data we hold about you is data we receive directly from you where you have applied for a position (for example by completing application forms or by corresponding with us by mail, phone, email or otherwise) but we may also:

- (a) receive information about you from other sources (for example, employment agencies, education providers, previous employers, referees, background and pre-employment screening checks); and
- (b) create data about you during the recruitment process (for example notes and decisions from interviews)
- (c) information that you make public (e.g., job websites including professional networking sites such as LinkedIn).

FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

When you apply for a vacancy, whether directly by contacting the Company, including registering online on the Company's website or indirectly through an external recruiter, we process the Personal Data you provide in our recruitment database to manage and consider your application and if we decide to offer you the role, we will then carry out any pre-employment background checks and obtain references.

In some cases, the Company processes your Personal Data to comply with laws and regulations. For example, to check that you are entitled to work in the jurisdiction that you have applied.

Processing necessary for the purposes of the legitimate interests of Company, include for example dealing with legal disputes or claims that relate to or involve you and to monitor gender diversity and equality.

You may consent for specific additional purposes to the processing of your Personal Data for example to retain your application, on the basis that a further opportunity may arise in future and we may wish to consider you for that. We will tell you when we obtain your consent.

PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA AND CRIMINAL OFFENCE DATA

For personal data relating to criminal convictions and offences and special categories of data, such as data concerning health, racial or ethnic origin, religious or philosophical beliefs, political opinions, biometric data, data concerning your sex life or sexual orientation or trade union membership, the main examples of how we may use your particularly sensitive personal information are:

- we may collect information about your criminal offence history where we are either required (as a regulated entity) or entitled to carry out criminal records checks to satisfy ourselves that there is nothing in your criminal offence history which makes you unsuitable for the role;
- we may use information about your physical or mental health, or disability status, to change the recruitment process so that you can be considered for a role;
- we may use information about your race or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to meet our regulatory reporting obligations and monitor, manage and report on diversity and equality. The provision of this information is voluntary, and you are under no obligation to provide this.

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FOR HOW LONG WILL THE DATA BE STORED?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it. This means that data will be destroyed or erased from our systems when it is no longer needed or if we have a legal obligation to destroy or erase it. To determine the appropriate retention period, we consider the nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process that data and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

If we 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 write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

Non-public data can be accessed by relevant Company departments such as IT, HR, Legal and Compliance, but only to the extent necessary to fulfil their respective tasks.

We may share your Personal Data with the following categories of third parties for purpose of processing your application:

- Other group companies (Company affiliates and subsidiaries)
- Pre-employment screening check providers
- Recruitment agencies
- Disclosure & Barring Service, Disclosure Scotland, or Access NI for individuals located in Northern Ireland and relevant International governing body for individuals that have been resident outside of the UK within the last 18 months
- Home Office and other government departments
- Credit reference and Fraud agencies
- Third-party service providers

If you are resident in the UK or EEA, please be aware that your Personal Data may be transferred to data recipients in countries located outside the European Economic Area (EEA) and UK, to group companies located in the USA.

Should Personal Data be transferred to data recipients located outside of the EEA and UK, such transfers will be protected by appropriate safeguards. To obtain a copy of such safeguards you may address a request according to section "QUESTIONS OR REQUESTS FOR ACCESS, CORRECTION AND REMOVAL?".

When a third party processes your Personal Data solely following the Company's instructions, it acts as a data processor. We enter into an agreement with such a data processor concerning the processing of Personal Data. In this agreement we include, at a minimum, obligations to safeguard that your Personal Data are solely provided to the data processor to provide services to us.

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QUESTIONS OR REQUESTS FOR ACCESS, CORRECTION AND REMOVAL?

For candidates located in certain jurisdictions you may in some circumstances have certain rights in relation to your Personal Data which may include:

- the right to access and to receive a copy of the information the Company holds about you;
- if appropriate, the right to have inaccurate Personal Data rectified or completed if it is incomplete;
- the right to request the erasure of Personal Data when the use or other processing of such Personal Data is no longer necessary for the purposes described above or where the processing is not or no longer lawful for other reasons;
- in cases where the accuracy of the Personal Data is contested, the processing is unlawful, or where you have objected to the processing of your Personal Data, you may ask for the restriction of the processing of such Personal Data;
- the right to object to the processing of Personal Data; and
- the right to request that the Company transfers your information to another party or to receive a copy of data you have provided.

We do not use automated processes or profiling to assess your suitability for a role.

If you want to make a rights request, you can do so from our privacy rights portal [here](#). We will also inform you whether the right applies in the jurisdiction you are resident.

If you wish to make a complaint about how your Personal Data is processed, you can contact the Company in the first instance, and we will endeavour to deal with such request as soon as possible.

TRANSFER WITHIN THE GLOBAL ORGANISATION OF COWEN FIRMS

We share information about you with other firms in the Cowen global organisation as part of international engagements, and with Cowen Inc. (<https://www.cowen.com/>), as part of our Data Processing Agreement where required or desirable to meet our legal and regulatory obligations around the world.

LINKS TO OTHER SITES

Please be aware that Cowen Inc. websites will typically contain links to other sites. Those sites may not be governed by our Privacy Notice but by other Privacy Notices that will often be different. We encourage users to review the privacy policy of each website visited before disclosing any personal information.

HOW TO CONTACT US

Should you have any questions regarding the processing of your Personal Data, you can address a request in writing at:

Attn:

Director, Privacy and Data Governance
UK Head of Operational Risk and Control
Email: privacy@cowen.com