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Bank of London & The Middle East

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# Recruitment Privacy Notice

30 September 2025

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### 1. Introduction

This Privacy Notice ("**Notice**") explains what personal information we collect and use about you, who we share it with and how you can exercise your data protection rights.

This Notice applies to the personal information we collect and process about job candidates (prospective employees) in connection with their application for employment.

### 2. Who we are

Your personal information is collected by:

- Bank of London and The Middle East plc ("**BLME**"), a company registered in England and Wales under company registration number 05897786 and registered office address at 20 Churchill Place, Canary Wharf, London, E14 5HJ;
- Bank of London and The Middle East plc ("**DIFC Branch**"), a branch office registered in the Dubai International Financial Centre (the "**DIFC**") under DIFC registration number 1317 and registered office address at Office 2904, Level 29, Al Fattan Currency House, DIFC, Dubai, UAE, PO Box 506557; or
- BB2 Digital and Technology Services Limited ("**BB2**"), a company registered in England and Wales under company registration number 13074216 and registered office address at 20 Churchill Place, Canary Wharf, London, E14 5HJ.

BLME, DIFC Branch and BB2, are part of the Boubyan Bank Group and act as separate independent Controllers of your personal information for the purposes of the applicable data protection laws. The Controller responsible for the collection and processing of your personal information (i.e. your prospective employer) is identified in the relevant careers portal, job advertisement or role description.

In this Notice BLME, DIFC Branch and BB2 are referred to as "**we**", "**us**", "**our**" or "**the business**".

### 3. How to contact us

If you have any questions about the contents of this Notice or would like to exercise your data protection rights, please contact our Data Protection Officer at:

Data Protection Officer  
BLME  
20 Churchill Place  
Canary Wharf  
London  
E14 5HJ

email: [dpo@blme.com](mailto:dpo@blme.com)

### 4. Complaints

If you have any concerns about the way we collect and process your information, please contact our Data Protection Officer in the first instance, using the contact details provided in section 3 (How to contact us).

You also have the right to complain to the relevant data protection regulator at any stage.

The UK Information Commissioner's Office can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Tele: 03031231113

Website: [ico.org.uk](https://ico.org.uk)

Where the DIFC data protection law applies, the DIFC Commissioner of Data Protection can be contacted at:

Tele: +971 (0)4362 2222

email: [commissioner@dp.difc.ae](mailto:commissioner@dp.difc.ae)

### 5. Collecting personal information

We collect personal information in accordance with applicable laws, where necessary to manage and administer your application for employment, operate our business, and comply with our legal and regulatory obligations. This information may be collected from you directly and indirectly from other third-party sources.

You are required to provide any information we reasonably require to manage and administer your application for employment and comply with our legal and regulatory obligations. If you do not provide the information we require, we may be unable to consider your application for employment or we may withdraw an offer of employment with immediate effect. Where the provision of specific information is mandatory, we will highlight this at the time of collection.

Where you provide personal information about third-party individuals (e.g. spouse, civil partner, children, dependants, beneficiaries, emergency contacts or your representatives), where appropriate, you should provide these individuals with a copy of this Notice to ensure they are aware of how we will use their information.

We rely on the availability of accurate personal information to manage and administer the recruitment and selection process. You should therefore ensure that any information you provide to us is accurate and complete to the best of your knowledge.

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### 5.1 Information we collect directly

The categories of personal information we collect about you directly may vary and is largely dependent on your specific circumstances. However, the categories of information we collect from you directly will generally include the information described in Schedule 1.

### 5.2 Information we collect indirectly from third parties

We also collect personal information about you indirectly from third parties, where necessary to assess your application, onboard you as an employee, manage risks and comply with our legal and regulatory obligations. The categories of information we collect about you indirectly will generally include the information described in Schedule 2.

Where appropriate, personal information about you may be sourced indirectly from third parties prior to your employment and following your acceptance of a job offer.

### 5.3 Information we create and collect automatically

We create personal information about you and also collect information about you automatically as part of your application for employment. The categories of information we collect and process in this context are described in Schedule 3.

## 6. How we use your personal information

### 6.1 Lawful bases for processing

We are required to satisfy at least one of the lawful bases for processing personal information set out in the applicable data protection laws, before collecting and processing information about you. When we collect and process personal information, we rely on one or more of the lawful bases described below.

| Lawful bases        | Description                                                                                                                                                                                |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consent             | When you give us your permission to carry out the processing                                                                                                                               |
| Contract            | Where the processing is necessary to take steps to enter into a an agreement with you, or fulfil our obligations in the agreements we enter into with you, such as the employment contract |
| Legal obligation    | Where the processing is necessary to comply with our legal and regulatory obligations                                                                                                      |
| Vital interests     | Where the processing is necessary to protect your vital interests or those of a third party                                                                                                |
| Legitimate interest | Where the processing is necessary to pursue legitimate interests                                                                                                                           |

### 6.2 How we use your personal information

We collect personal information where necessary to manage and administer your application for employment, operate our business, and comply with our legal and regulatory obligations.

This section describes the specific processing purposes for which we collect and process your personal information and which of the lawful bases (described above in section 6.1) we rely on to carry out the processing.

#### 6.2.1 Recruitment and selection

We assess your suitability for the role and make decisions about your recruitment and selection.

We carry out this processing to comply with our legal obligations, take steps to enter into employment contracts with prospective employees and pursue our legitimate interests, i.e. we have a legitimate interest in assessing the suitability of prospective employees to ensure they are competent to perform any roles offered.

#### 6.2.2 Communications

We communicate with you to arrange interviews and keep you abreast of developments during the recruitment and selection process.

We carry out this processing to pursue our legitimate interests, i.e. we have a legitimate interest in communicating with prospective employees during the recruitment and selection process.

#### 6.2.3 Offers of employment

We make offers of employment and take steps to onboard you as employee where you accept an offer of employment.

We carry out this processing to comply with our legal obligations, take steps to enter into employment contract with our prospective employees and pursue our legitimate interests, i.e. we have a legitimate interest in ensuring prospective employees are engaged on appropriate terms and onboarded in a timely and efficient manner.

#### 6.2.4 Vetting and background screening

Where permitted by applicable laws, we conduct pre-employment and ongoing background screening checks, including right to work checks and reference checks.

We carry out this processing to comply with our legal obligations and pursue our legitimate interests, i.e. we have a legitimate interest in assessing the suitability of prospective employees, to ensure they are competent to perform their roles, are of good repute and have the right to work in the relevant jurisdiction.

### **6.2.5 Physical security**

We manage and monitor the physical security of our office premises and maintain building access control logs when you visit our office premises. We use CCTV in and around our office premises for this purpose.

We carry out this processing to pursue our legitimate interests, i.e. we have a legitimate interest in protecting the security of our office premises and the confidentiality, integrity and availability of our networks, information technology systems and information assets.

### **6.2.6 Audits and assessments**

We conduct audits and assessments to ensure our recruitment and selection process is carried out in accordance with our internal policies and procedures and our legal obligations.

We carry out this processing to pursue our legitimate interests, i.e. we have a legitimate interest in setting appropriate policies and procedures for employees aligned to corporate governance best practice and our legal and regulatory obligations, and monitoring compliance across our workforce to ensure adherence to our standards.

### **6.2.7 Equality and diversity monitoring**

Where permitted by applicable laws, we conduct monitoring to ensure equality of opportunity and diversity in connection with your job application and to comply with anti-discrimination laws.

We carry out this processing to comply with our legal obligations and pursue our legitimate interests, i.e. we have a legitimate interest in preventing unlawful discrimination and ensuring the equality of treatment of prospective employees.

### **6.2.8 Records management**

We maintain appropriate recruitment and selection records relating to your job application.

We carry out this processing to comply with our legal obligations, take steps to perform our obligations in the employment contract with and pursue our legitimate interests, i.e. we have a legitimate interest in maintaining appropriate records relating to prospective employees to manage and administer the recruitment and selection process and defend ourselves from legal claims.

### **6.2.9 Preventing and detecting crime**

We prevent and detect crime and facilitate the apprehension and prosecution of offenders.

We carry out this processing to pursue our legitimate interests, i.e. we have a legitimate interest in preventing and detecting crime, including fraud and other unlawful acts to protect our business.

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### 6.2.10 Business continuity and emergency planning

We manage business continuity and ensure the health and safety of prospective employees while they are on our premises.

We carry out this processing to comply with our legal obligations, protect your vital interests and pursue our legitimate interests, i.e. we have a legitimate interest in protecting the health and safety of our prospective employees in emergency.

### 6.2.11 Legal and regulatory obligations

We process your personal information to comply with our legal and regulatory obligations in connection with your application, e.g. health and safety and other applicable legislation.

We carry out this processing to comply with our legal obligations.

### 6.2.12 Protecting our rights

We process your personal information to protect and defend our legal rights, by enforcing our rights under any agreements you have entered into with us, protecting our intellectual property, defending complaints, disputes or associated litigation.

We carry out this processing to pursue our legitimate interests, i.e. we have a legitimate interest in enforcing our legal rights to protect our business.

## 7. Sensitive personal information

### 7.1 Categories of sensitive information

Some of the information we collect and process about you includes sensitive personal information, also commonly referred to as special categories of personal information. We only collect sensitive personal information if we have your explicit consent or if we are lawfully permitted to collect the information without your consent.

The categories of sensitive personal information that we collect about you are described below.

| Categories              | Description                                                 |
|-------------------------|-------------------------------------------------------------|
| Racial or ethnic origin | Details about your race or ethnicity                        |
| Health information      | Details about your health status and disabilities           |
| Criminal convictions    | Details about your criminal convictions or alleged offences |



### 7.2 How we use sensitive personal information

This section describes how we use your sensitive personal information and why we carry out the processing.

#### 7.2.1 Vetting and background screening

Where permitted by applicable laws, we conduct pre-employment and ongoing background screening checks, including right to work checks and reference checks.

We carry out some aspects of this processing to fulfil our obligations and exercise specific rights in the field of employment, social security and social protection law, e.g. to carry out immigration and right to work checks, and where necessary for reasons of substantial public interest where the processing is permitted by applicable national laws to prevent or detect crime and other unlawful acts.

#### 7.2.2 Equality and diversity monitoring

Where permitted by applicable laws, we conduct monitoring to ensure equality of opportunity and diversity in connection with your application for employment and to comply with anti-discrimination laws.

We carry out some aspects of this processing on a voluntary basis with your explicit consent, e.g. where you choose to provide us with equality and diversity monitoring data, you are consenting to the collection and processing of your information for this purpose.

#### 7.2.3 Preventing and detecting crime

We prevent and detect crime and facilitate the apprehension and prosecution of offenders.

We carry out some aspects of this processing where necessary for reasons of substantial public interest where the processing is permitted by applicable national laws to prevent or detect crime and other unlawful acts.

#### 7.2.4 Legal and regulatory obligations

We process your personal information to comply with our legal and regulatory obligations in connection with your prospective employment, e.g. health and safety and other applicable legislation.

We carry out some aspects of this processing to fulfil our obligations and exercise specific rights in the field of employment, social security and social protection law, e.g. to comply with health and safety legislation.

#### 7.2.5 Protecting our rights

We process your personal information to protect and defend our legal rights, by enforcing our rights under any agreements you have entered into with us, protecting our intellectual property, defending complaints, disputes or associated litigation and collecting any outstanding payments or debts.

We carry out some aspects of this processing to exercise or defend legal claims, prospective legal claims or other claims of a similar nature.

### 7.2.6 Reasonable adjustments

If you inform us that you have a disability, we may process your personal information to make reasonable adjustments to enable you to access our premises and participate in the recruitment and selection process.

We carry out this processing where necessary for reasons of substantial public interest where the processing is permitted by applicable national laws to ensure equality of opportunity or treatment.

## 8. Who we share your personal information with

### 8.1 Data sharing purposes

Where necessary, we share some of your information with third parties in order to:

- carry out vetting, background screening and risk management checks to assess your suitability for employment
- manage and administer your application for employment
- comply with our legal and regulatory obligations
- prevent and detect crime or for regulatory reporting purposes
- obtain employment references
- exercise or protect our rights, or
- where we have another legitimate business reason.

### 8.2 Categories of recipients

We share information with the following categories of recipients:

- Boubyan Bank Group affiliates, where necessary to operate our business
- Courts of law and the judiciary in any jurisdiction, where the law requires us to
- Dispute resolution bodies
- Law enforcement and government agencies, where necessary to prevent and detect crime
- Professional advisors that help us operate our business, e.g. legal advisors, claims investigators, accountants, auditors, compliance advisors and risk management providers
- Public authorities and government agencies, where necessary for us to comply with our legal and regulatory obligations
- Recruitment agencies, where you are represented by a recruitment agency during the job application and recruitment process, and the sharing of data with the agency is necessary to consider your application, make you a job offer and manage and administer your onboarding as a prospective employee

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- Successors of our business, if we are sold to, acquired by or merged with another organisation, in whole or in part
- Third-party service providers that process personal information on our behalf, in accordance with our strict instructions and our security standards
- Vetting and background screening providers, where necessary to conduct employment vetting and good reputation checks, e.g. these may also include, credit reference agencies, educational and examining bodies, professional membership bodies, public authorities and government agencies
- Your former employer, where necessary to obtain an employment reference, or
- Other third parties, where we are legally required to under applicable laws or it is reasonable in all the circumstances to do so to operate our business

### 9. How we protect your information

We have implemented appropriate technical and organisational security measures to keep your information secure, including pseudonymisation, encryption and other security measures. These security measures are designed prevent unauthorised access, loss, misuse or alteration of your information.

### 10. How long we keep your information

We keep your personal information for as long as is necessary to fulfil the purpose for which it was collected and other purposes required by law. The retention period will usually include the duration of the recruitment and selection process and following this, the applicable statute of limitation period. However, we may retain your information for a longer period if this is necessary to comply with our legal and regulatory obligations, prevent and detect crime or manage and administer any ongoing complaints or disputes, including any associated litigation. When information is no longer required it will either be anonymised so that it no longer relates to you, or securely destroyed

Notwithstanding the above, it is important note that if we offer you employment and you accept, different retention periods will apply to the collection and processing of your personal information, which is explained in our separate Employment Privacy Notice.

### 11. International transfers

We are established in the UK and DIFC. However, some of the third-party service providers we rely on to process personal information on our behalf are established in other countries and territories outside the UK and DIFC.

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We may therefore transfer your personal information to other countries and territories outside the UK and DIFC where necessary to operate our business, including to some countries and territories that may not be considered to provide an equivalent level of protection for information.

However, where we make such transfers we will put in place appropriate safeguards, such as approved standard contractual clauses and, where necessary, other technical and organisational measures, to ensure the information is afforded an adequate level of protection.

If you require further information about the international transfers we make involving your information and the safeguards we have in place, please contact our Data Protection Officer, using the contact details provided in section 3 (How to contact us).

## 12. Your information rights

### 12.1 Information rights

You have a number of rights in relation to the personal information that we hold about you. The availability of these rights and the ways you can use them are explained in more detail below.

| Information rights | Description |
|--------------------|-------------|
|--------------------|-------------|

|               |                                                                                                                                                                                                                                                             |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Access        | You can ask us if we are processing information about you and, where that is the case, request a copy of the information                                                                                                                                    |
| Rectification | You can ask us to rectify any inaccurate or incomplete information we are holding about you                                                                                                                                                                 |
| Erasure       | You can ask us to erase information we are holding about you. However, this is not an absolute right, and we may refuse a request for erasure if we need to keep your information                                                                           |
| Restriction   | You can ask us to restrict the processing of information about you in certain circumstances. However, this is not an absolute right, and we may refuse a request for restriction where appropriate                                                          |
| Portability   | You can ask us to transfer some of the information we are holding about you to a third party, in a structured machine-readable format                                                                                                                       |
| Object        | You can object to the processing of information about you in certain circumstances. However, this is not an absolute right, and we may refuse to cease processing the information, where there are compelling legitimate grounds to continue the processing |

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|                      |                                                                                                                                                                                                                         |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Automated processing | You can ask not to be subject to a decision that is taken about you automatically using our technology, without human involvement, which significantly affects you                                                      |
| Consent withdrawal   | If we rely on your consent to process information about you, you can withdraw your consent at any time. However, we may still be entitled to process your information if we have another legitimate reason for doing so |

### 12.2 Exercising your information rights

If you would like to exercise your data protection rights, please contact our Data Protection Officer, using the contact details provided in section 3 (How to contact us).

It is important to note, however, that some of the aforementioned rights are not absolute and can only be exercised in certain circumstances. If we are unable to fulfil an information rights request, will write to you explain the reason for refusal.

## 13. Changes to this Notice

This Notice is not contractual and will be updated from time to time to ensure it continues to accurately reflect the way we collect and process personal information. You should therefore periodically review this Notice to understand how we collect and use your information.

We will also notify you in advance of any material changes that we make to the Notice, so you understand what impact any changes may have on you and how you can exercise your rights.

## Schedule 1

This Schedule describes the categories of personal information we may collect from you directly.

| Categories                       | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Personal details                 | <ul style="list-style-type: none"><li>• Title, name, age, date of birth, place of birth, gender, country of residence, race, religion, nationality, number of dependants, marital status and information about your spouse, languages spoken, immigration and right to work status and details about any disabilities</li></ul>                                                                                                                                                                                                         |
| Contact information              | <ul style="list-style-type: none"><li>• Postal address, email address, telephone number and emergency contacts</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                |
| Recruitment and selection        | <ul style="list-style-type: none"><li>• Your application for employment, CV, job title, personal profile, skills, work experience, training, employment history, educational and professional history and qualifications, professional memberships, licenses and certifications, and hobbies and interests</li><li>• Interview and assessment outcomes, competency assessments and any other pertinent information relating to your application for the job role</li><li>• General records of your application for employment</li></ul> |
| Financial details                | <ul style="list-style-type: none"><li>• Salary, bonus, commission and compensation history</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Identity details                 | <ul style="list-style-type: none"><li>• Birth certificate, photo identification, national ID card, passport, national insurance number, social security number, tax identification number, driver's licence, visa, Foreign Identification Number and proof of address</li></ul>                                                                                                                                                                                                                                                         |
| Vetting and background screening | <ul style="list-style-type: none"><li>• Where appropriate and permitted by applicable local laws, employment referees, criminal convictions, credit history, financial sanctions and details of any sanctions disqualifying you from acting as a director or officer of a company</li></ul>                                                                                                                                                                                                                                             |
| Physical and logical security    | <ul style="list-style-type: none"><li>• Where you visit our office premises, building access control logs and security monitoring system information</li></ul>                                                                                                                                                                                                                                                                                                                                                                          |
| Correspondence                   | <ul style="list-style-type: none"><li>• Records of any correspondence between us via various channels</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Other information                | <ul style="list-style-type: none"><li>• Where appropriate, we may also collect other information about your application for employment if it is reasonable in all the circumstances to do so to manage and administer your application, operate our business and comply with our legal and regulatory obligations</li></ul>                                                                                                                                                                                                             |

### Schedule 2

This Schedule describes the categories of personal information we may collect indirectly.

| Categories                       | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Personal details                 | <ul style="list-style-type: none"><li>• Title, name, age, date of birth, place of birth, gender, country of residence, immigration and right to work status</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                              |
| Vetting and background screening | <ul style="list-style-type: none"><li>• Where appropriate and permitted by applicable local laws, employment references, criminal convictions, credit history, financial sanctions, details of any sanctions disqualifying you from acting as a director or officer of a company, training, employment history, educational and professional history and qualifications, professional memberships, licenses and certifications, publicly available information and any other pertinent information relating to your application for the job role or continued employment</li></ul> |
| Other information                | <ul style="list-style-type: none"><li>• Where appropriate, we may also collect other information about your application for employment if it is reasonable in all the circumstances to do so to manage and administer your application, operate our business and comply with our legal and regulatory obligations</li></ul>                                                                                                                                                                                                                                                        |

### Schedule 3

This Schedule describes the categories of personal information we may create or collect automatically<sup>1</sup>.

| Categories                        | Description                                                                                                                                                                                                                                                                                                                |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recruitment and selection records | <ul style="list-style-type: none"><li>• General records of your application for employment</li><li>• Interview and assessment outcomes</li></ul>                                                                                                                                                                           |
| Physical and logical security     | <ul style="list-style-type: none"><li>• Where you visit our office premises, CCTV recordings, building access control logs and security monitoring system information</li></ul>                                                                                                                                            |
| Correspondence                    | <ul style="list-style-type: none"><li>• Records of any correspondence between us via various channels</li></ul>                                                                                                                                                                                                            |
| Other information                 | <ul style="list-style-type: none"><li>• Where appropriate, we may also create other information about your application for employment if it is reasonable in all the circumstances to do so to manage and administer your application, operate our business and comply with our legal and regulatory obligations</li></ul> |

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<sup>1</sup> Some of the personal information we create may be derived from information you provided to us.