



Candidate Privacy Policy

This Candidate Privacy Policy ('Policy') explains how OFX collects, uses, discloses stores and processes your Personal Information during the recruitment process when we process your application and consider you for potential employment.

If you are offered and you accept a role at OFX, the Personal Information collected during the recruiting process will become part of your employee file and this Policy will cease to apply.

In this Policy:

OFX, we, us and **our** refers to OFX Group Limited, OzForex Limited, CanadianForex Limited, NZForex Limited, OzForex (HK) Limited, OFX Japan G. K, OFX Payments Ireland Limited, OFX Singapore Pte. Limited, UKForex Limited, USForex Inc, Paytron Holdings Pty Ltd, Paytron Technologies Pty Ltd and PTRN Pty Ltd.

Personal Information refers to any information or opinion relating to or about an individual or an individual who is reasonably identifiable.

1. Information we collect

We may collect some or all of the following information in connection with your application for employment with us:

- **identifiers and contact information**, such as your name, date of birth, gender, address, email address, telephone number, personal references and contact details;
- **identity and work eligibility information**, such as your passport, driver licence details, national identification number, social security number, social insurance number, national insurance number, government identification number, country, region, city of birth, nationality, citizenship status, visa status and immigration status;
- **employment history and educational information**, such as your resume, cover letter, employment history and qualifications, educational history and certifications and information from publicly available sources relevant to assessing your suitability for the role you have applied for;
- **assessment data**, such as results from psychometric or aptitude tests to evaluate your skills, abilities and suitability for the role you have applied for;
- **background check information**, such as information received from criminal, credit, employment or educational background checks and other information revealed during background screenings;



- **recordings**, such as recordings of telephone or video interviews with you (and transcripts of such interviews); and
- other information you may provide in your resume which is not listed here.

If we cannot collect the above information, we may be unable to process your application.

Our application form may contain optional questions that are designed to help us understand the diverse identities and backgrounds of applicants to OFX. These questions may ask about more sensitive information such as your sexual orientation, disability status and/or racial or ethnic background. Your responses to these questions are entirely voluntary. Choosing to answer or not answer will not affect your employment opportunities or the hiring process in any way.

We will only process any health information you may share where we need to make reasonable adjustments to your recruitment process or to evaluate your ability to meet the essential requirements of the role you have applied for, in line with applicable equal opportunity and employment laws.

2. How we collect information

We collect Personal Information directly from you during the recruitment process.

We also collect Personal Information about you from other people or organisations, such as from your referees, criminal background checks (DBS), your previous employers and/or educational institutions, recruitment agencies, background check providers and publicly available sources (e.g. LinkedIn and other social media).

We may combine the Personal Information we receive from various sources with Personal Information we collect from you and use it as described in this Policy.

3. How we use your information

We process your Personal Information for several purposes, such as to:

- evaluate your work experience, education, certifications, licenses or other qualifications, skills, and interests against the job opportunity you are applying for;
- communicate with you about the hiring process and the status of your application, such as to make an offer of employment to you;
- contact you about suitable job opportunities as they may arise, with your consent where required by applicable laws ;
- conduct background checks and verify your employment history, educational background, and references, as permitted by applicable law;



- analyse job applicants and/or candidate life cycle trends, including generating reports in an aggregated and de-identified or anonymised format; and
- comply with any applicable laws, regulations, codes of conduct, binding determinations or to respond to legal process or government authorities.

If EU or UK data protection laws apply to the processing of your personal data, below is our legal basis for processing it:

We collect and process your personal data based on our legitimate interests, to assess your suitability for the role you have applied for and to decide whether to enter into a contract of employment with you. We may also seek your consent to process your personal data in specific circumstances or process it where necessary to comply with a legal obligation or for purposes connected to legal claims. If we use your data to improve our recruitment or employment practices, we do so on the basis that it is in our legitimate interests to ensure we recruit the best possible candidates and manage our workforce effectively.

4. Information sharing and disclosure

We may share your Personal Information with the following on a need to know basis:

- interviewers involved in your recruitment process, OFX group companies for internal administration and management purposes;
- third-party service providers who assist us with recruitment, talent acquisition, background checks and related administrative activities ;
- professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they provide to us;
- regulatory authorities, law enforcement agencies, or other government bodies as required by law; and
- other authorised third parties, with your consent.

We may share your Personal Information with potential third party acquirers in connection with any potential corporate merger, acquisition, consolidation, reorganisation, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets.

We take reasonable steps to ensure that any third parties who handle your Personal Information comply with applicable privacy laws and are bound by appropriate confidentiality obligations.

5. Automated decision making



We may use automated tools as part of our recruitment process. For example, our application forms may include eligibility questions, such as confirming whether you hold a valid working visa for the country you are applying to. If you do not meet these essential criteria, your application may be automatically declined. We may also use automated tools to score your application and prioritise candidates for review. If you feel that any such processes may have impacted you, please contact us at privacy@ofx.com.

6. International transfers

We collect information globally and may transfer, process and store your Personal Information outside of your country of residence, to wherever we, our third party service providers or any recipients referred to in section 4 are located. Countries to which we are likely to transfer your Personal Information are the United States of America, Canada, United Kingdom, countries in the European Economic Area, Australia, New Zealand, Hong Kong and Singapore. Whenever we transfer your Personal Information, we take steps to protect it.

If you are a resident of the EU or UK, we ensure that such transfers are conducted in accordance with applicable data protection laws, including by implementing appropriate safeguards such as Standard Contractual Clauses.

7. How long we keep information

We retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws or regulations. How long we keep your Personal Information will depend on whether your application is successful, the nature of the data concerned and the purposes for which it is processed.

If you are an unsuccessful job applicant, we may retain your Personal Information for a reasonable period after the recruitment process concludes, taking into account any limitation periods for potential claims, such as allegations of discrimination against candidates on prohibited grounds, and to demonstrate that we have conducted the recruitment exercise in a fair and transparent way.

If your application is successful, your Personal Information will become part of your employee file and handled in accordance with our internal policies.

8. Your rights

Depending on your jurisdiction, you may have certain rights regarding your Personal Information. These may include:

- the right to access your Personal Information;
- the right to correct inaccurate Personal Information;



- the right to request deletion of your Personal Information;
- the right to restrict or object to processing of your Personal Information; and
- the right to data portability.

To exercise these rights, please contact us using the details provided at the end of this Policy.

In certain instances, local data protection and privacy laws may allow us to legitimately and properly refuse your requests, for instance, to protect the rights of third parties or to preserve the confidentiality of management deliberations, or if you have asked us to delete information which we are required by law or have compelling legitimate interests to keep.

9. Security

We implement appropriate technical and organisational measures to protect your Personal Information against unauthorised or unlawful processing, accidental loss, destruction, or damage.

10. Changes to this Policy

We may update this Policy from time to time by posting a revised version on this website to reflect changes in our practices or legal requirements.

11. Contact us

If you have any questions or concerns about this Policy or how we handle your Personal Information, please contact us at privacy@ofx.com.

If we can't resolve your concerns, you can also raise your concerns to the appropriate authority in your jurisdiction:

Jurisdiction	Authority
Australia	Australian Information Commissioner http://www.oaic.gov.au
Canada	Office of the Privacy Commissioner of Canada https://www.priv.gc.ca
European Union	Data Protection Authority of your member state
Hong Kong	Office of the Privacy Commissioner for Personal Data https://www.pcpd.org.hk/



T +61 (0)2 8667 8000
E customer.service@ofx.com
OFX.com

Jurisdiction	Authority
Ireland	Data Protection Commission https://www.dataprotection.ie/en
New Zealand	Office of the Privacy Commissioner of New Zealand https://www.privacy.org.nz/
Singapore	Personal Data Protection Commission http://www.pdpc.gov.sg/
United Kingdom	Information Commissioner's Office https://ico.org.uk/
United States	Federal Trade Commission https://www.ftc.gov

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