GATEWAY
fund services

Applicant Privacy Notice



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1. Introduction

This Privacy Notice applies to all job applicants and potential candidates for employment with Gateway Fund Services Limited ("**GFSL**"), either submitted as part of an online application and/or through alternative channels (e.g., via professional recruiting firms or directly to the Firm).

This notice describes how GFSL, as a data controller, collects, uses, shares, and retains the personal information you provide and informs you about your personal data rights.

GFSL is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws.

For the purposes of this Privacy Notice, references to "**we**," "**us**" or "**our**" shall refer to "**GFSL**."

2. Who are we?

Gateway Fund Services Limited ("**GFSL**") is a fund management company, authorised and regulated by the Central Bank of Ireland (**"CBI"**), with offices at 56 Fitzwilliam Square North, Dublin 2, Ireland. CBI authorisation number C183076, Company Number 635186.

Further details regarding us can be located on the Central Bank of Ireland's website under the Registers section, www.registers.centralbank.ie.

3. How to contact us?

You can contact us at gateway@gfsmanco.com or by calling +353 1 533 7813 or by writing to us at Gateway Fund Services Ireland, 56 Fitzwilliam Square, Dublin 2, D02 X224, Ireland.

4. How do we collect your personal data?

We collect personal information about you during the recruitment process either directly from you or sometimes from a third party such as an employment agency. We may also collect personal information from other external third parties, such as references from current and former employers, information from background check providers, information from credit reference agencies and criminal record checks providers.

Other than employment agencies, we will only seek personal information from third parties during the recruitment process once an offer of employment or engagement has been made to you and we will inform you that we are doing so.

5. What personal information do we process about you?

Personal data means any information relating to you. We may collect, process, and use the following categories and types of personal data about you:

- **Identification data**, such as your name, nationality and citizenship, passport data, photo, drivers' licence information, health insurance, and personal public service number (PPSN)
- **Personal information**, such as your date and place of birth, emergency contact details, and gender
- **Contact details**, such as your home address, telephone number, and email address
- **Education and work experience**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience
- **Other application data**, such as the information included in your application form/CV

- **Information collected as part of the interview process**, such as notes taken from your interview or information provided from recruitment agencies

- **Background check information**, such as information obtained through reference checks and confirmation about your work/educational background.

together **Applicant Data.**

In addition to the collection, processing, and use of the **Applicant Data**, GFSL may collect, process, and use the following special categories of personal information about you which we describe as **Sensitive Applicant Data**:

- **Health and medical data**, such as information on disability

- **Criminal records data**, if GFSL has conducted or received the results of criminal records background checks in relation to you, where relevant and appropriate to your role

- **Race or ethnicity data** such as information contained in your passport or other citizenship and right to work documentation, and information which you have voluntarily provided to GFSL during the application process

6. Why we collect your personal information and the lawful basis for processing

We need to process data to take steps at your request to assess appropriate fit for a position prior to entering a contract with you. We may also need to process your data to enter a contract with you. In some cases, we need to process data to ensure that we are complying with our legal obligations.

Processing Purposes	Lawful Basis
Administering and processing your application (including processing a job offer should you be successful) including identification data, contact details, information about your qualifications and employment history, information obtained during your interview and information contained in your CV	Your Personal Data is processed based on **our legitimate interests** to pursue our business by employing employees, workers, contractors, to administer your application, assess your suitability for the position and to verify your information as well as in order to take steps requested by you prior to potentially entering into an employment contract with you
To determine your eligibility for the role you applied for, including identification data, contact details, information about your work and education experience, information obtained during your interview and information contained in your CV	
Conducting background checks as part of your application, including identification data, contact details, information about your qualifications and employment history	
Complying with applicable laws and employment-related requirements along with the administration of those requirements, such as income tax, national insurance deductions, and employment and immigration laws which involves the processing of identification data and contact details	We need to process data to ensure that we are complying with our **legal obligations**
Monitoring and ensuring compliance with applicable policies and procedures and laws, which involves the processing of your identification data and contact details	

7. What if you fail to provide personal information?

If you fail to provide certain personal information when requested, we may not be able to process your job application properly or at all, we may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory rights.

8. How do we store it?

We take the security of your personal data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Your personal information may be stored in different places, including on your application record, in our HR systems and in other IT systems, such as the e-mail system.

9. How long do we keep it?

If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process.

At the end of that period, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment.

10. Who has access to your data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. We will then share your data with third parties to obtain references and any employment background checks needed for your employment.

11. What are your rights?

You have several legal rights in relation to your personal data.

Right of access - you have the right to obtain a free of charge copy of your personal data undergoing processing from the data controller.

Right to rectification – you have the right to have your personal data undergoing processing to be corrected if inaccurate or completed if incomplete.

Right to erasure (to be forgotten) – you have the right to have your personal data undergoing processing erased in certain circumstances.

Right to restriction of processing – you have the right to have the processing of your personal data restricted in certain circumstances.

Right to object – you have the right to object to the processing of your personal data (including profiling) in certain circumstances.

Right to data portability – you have the right to receive your personal data undergoing processing in a structured, commonly used, and machine-readable format and the right to have this data transmitted to another data controller, in certain circumstances.

Right to complain – you have the right to lodge a complaint with the supervisory authority.

12. How to complain?

Write to the Data Protection Commission:

Postal Address: Data Protection Commission
6 Pembroke Row
Dublin
D02 X963
Ireland

Contact the Data Protection Commission using their webforms (preferred by Data Protection Commission)
How to contact us | Data Protection Commission

Telephone their helpdesk:

Helpdesk Hours
09:30 - 13:00hrs (Monday - Friday): 01 765 0100
14:00 - 17:30hrs (Monday - Friday): 1800 437 437

13. Date of this Notice and Updates

This notice is dated 08 August 2025. Any updates to this notice will be on our website and will be clearly marked as an update.