



Recruitment Notice: Processing of Personal Data

Revised: November 2025

CIBC is committed to taking all reasonable steps to preserve the confidentiality of the personal data it processes in order to manage its business and maintain employment relationships as well as professional relationships with potential candidates for employment.

This Recruitment Notice governs the processing and retention of personal data relating to potential candidates for employment in the United Kingdom.

This Recruitment Notice sets out how CIBC, who will act as a controller in relation to the handling of personal data for all potential candidates for employment in the United Kingdom, will process personal data in compliance with the UK General Data Protection Regulation and the Data Protection Act 2018 ("Data Protection Legislation"). This Recruitment Notice contains information which must be provided to you under Data Protection Legislation.

1. Your personal information is collected by Canadian Imperial Bank of Commerce "CIBC" ("we"/"us"/"our"). You can contact us at CIBC, whose registered address in the United Kingdom is 150 Cheapside, London, EC2V 6ET. If you have any questions or complaints in relation to the use of your personal information or this Recruitment Notice, you can contact our Data Protection Officer at DPO@cibc.com.
2. Personal Information Collected: We collect the information below about you during the recruitment process.
 - Information provided in your curriculum vitae, application form, covering letter and during the interview process including: your name, date of birth, age, gender, home address, personal email address, education, qualification and work experience details.
 - Information collected or created by us during the recruitment process including: interview notes, test scores and correspondence between us.
 - Information about criminal convictions: we process data relating to criminal convictions and offences to carry out background checks as part of the recruitment process.
 - Special categories of personal data including: information relating to disabilities, physical or mental health information and immigration/naturalisation records (if this discloses racial/ethnic origin information).
3. If you fail to provide us information: If you fail to provide certain information when requested, which is needed by us to consider your application, we will not be able to progress your application further.



4. Sources of Information: This information is collected from the following sources:
 - a. you, the candidate;
 - b. recruitment agencies, from whom we collect the following information: CV's, diversity data.
 - c. background check providers, from whom we collect the following information: Sterling background screening vendor
 - d. credit reference agencies, from whom we collect the following information: Sterling background screening vendor
 - e. Disclosure and Barring Service in respect of criminal convictions information; Sterling background screening vendor
 - f. your named referees, from whom we collect the following information: and
 - g. the following information is obtained from publicly accessible sources: Sterling background screening vendor.
5. How we use personal information: We use your personal information to progress the recruitment process, based on individuals skill set and experience for their suitability for the role, communication, to keep records of our hiring processes and to carry out background and reference checks. We will also use your information to comply with legal and regulatory requirements.
6. Why we use personal information: We will use the information collected from you because: (1) it is necessary for us to do so before entering into a contract with you; (2) we need to process your information in order to comply with a legal or regulatory obligation; or (3) because we or a third party have a legitimate interest to: (a) ensure the effective administration and management of the recruitment process; (b) ensure we hire a suitable individual for a role; (c) deal with disputes and accidents and take legal or other professional advice; and (d) ascertain your fitness to work. If you wish to obtain further information on how our legitimate interests are applied to your data, you can request them from us on the contact details above.
7. How we use special category personal information: We will process your special categories of personal data to consider whether: (1) we need to provide appropriate adjustments during the recruitment process; (2) comply with any legal or regulatory obligation. Where we need to process special category data or data relating to criminal convictions and offences, we will only process that data in accordance with Data Protection Legislation.
8. Why we use special category personal information: We will use special categories of personal information collected about you because: (1) you have provided your explicit written consent; (2) we need to do so to carry out our legal obligations or exercise our rights under employment law; (3) it is necessary for the establishment, exercise or defence of legal claims; (4) there is a substantial public interest; (5) it is necessary for health purposes, such as assessing your fitness for work; (6) it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.
9. Information about criminal convictions: As part of the recruitment process we carry out criminal background checks. We use these checks: (1) to assess your suitability for a regulated role; (2) to protect your interests, our interests and third party interests; (3) because it is necessary in relation to legal claims. We are allowed to use your personal information in this way where: (1) you have provided your explicit written consent; (2) it is necessary to carry out our legal obligations or exercise our rights under employment law; or (3) there is a regulatory requirement upon CIBC to establish whether you have been involved in unlawful acts, dishonesty, malpractice or other seriously improper conduct (including, but not limited to, regulatory requirements upon CIBC to satisfy its obligations under the Senior Managers and Certification Regime, and its background screening obligations with respect to roles



designated by the UK Financial Conduct Authority as “Material Risk Taker” roles or by the Canadian Office of the Superintendent of Financial Institutions as “High Risk” roles).

10. Automated decision-making: You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.
11. Information that we share: We will only share your personal information with the following third parties for the purposes of processing your application: employment agencies, background check and online test providers, credit reference agencies and regulators and competent authorities. We will also share personal data within our group for the purposes of administration, accounting and reporting purposes.
12. Retention of your information: We will retain your personal information for the duration of the recruitment process and for the length of any applicable limitation period for claims which might be brought against us later.
13. Where your information will be held: We may transfer the personal information we collect about you to Canada for the purposes of administering the recruitment process subject to us implementing appropriate safeguards. If you would like to obtain copies of such safeguards you can request them from us on the contact details above.
14. Your rights: You have the following rights in connection to your data:
 - a. the right to access your personal data;
 - b. the right to have your personal data corrected if it is inaccurate or incomplete;
 - c. the right to have your personal data deleted or removed if there is no reason for its continued storage and processing;
 - d. the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances;
 - e. the right to request the transfer of your personal data to another party; and
 - f. where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent.

If you wish to exercise any of these rights, please contact us as explained below.

15. Further Information: If you have any questions about your rights in relation to your personal data that CIBC processes, or you wish to exercise your rights, you should contact the UK Human Resources department at UKHumanResources@CIBC.co.uk.
16. Complaints: You also have the right to complain to the Information Commissioner’s Office (ICO) who is responsible for data protection issues in the United Kingdom:

Address: Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113



Email: icocasework@ico.org.uk

Website: <https://ico.org.uk>



Schedule 1

Luxembourg

For potential candidates in Luxembourg certain clauses in the body of the Recruitment Notice are replaced by the below provisions:

CIBC, who will act as a controller in relation to the handling of personal data for all potential candidates for employment in Luxembourg, will process personal data in compliance with the EU General Data Protection Regulation 2016/679 effective as from 25 May 2018, ("GDPR"), as implemented or complemented by the applicable national law ("Data Protection Legislation").

1. Your personal information is collected by CIBC Capital Markets (Europe) S.A. ("we"/"us"/"our"). You can contact us at CIBC, whose registered address in Luxembourg is CIBC 2C Albert Borschette, K2D1 L-1246 Luxembourg. If you have any questions or complaints in relation to the use of your personal information or this Recruitment Notice, you can contact our Data Protection Officer at DPO@cibc.com.
2. Personal Information Collected: We collect the information below about you during the recruitment process.
 - Information about criminal convictions: in certain situations, we may process data relating to criminal convictions and offences to carry out background checks as part of the recruitment process.
 - Special categories of personal data including: information relating to disabilities, physical or mental health information.
4. Sources of Information: This information is collected from the following sources:
 - a. you, the candidate;
 - b. recruitment agencies, from whom we collect the following information: CV's and Diversity Data.
 - c. background check providers, from whom we collect the following information: Sterling background screening vendor
 - d. credit reference agencies, from whom we collect the following information: Sterling background screening vendor
 - e. criminal record certificate casier judiciaire
 - f. your named referees, from whom we collect the following information: and
 - g. the following information is obtained from publicly accessible sources: Sterling background screening vendor.

9. Information about criminal convictions: As part of the recruitment process, we may carry out criminal background checks. We use these checks: (1) to assess your suitability for a regulated role; (2) to protect your interests, our interests and third party interests; (3) because it is necessary in relation to legal claims. We are allowed to use your personal information in this way where: (1) you have provided your explicit written consent; (2) it is necessary to carry out our legal obligations or exercise our rights under employment law; or (3) there is a regulatory requirement upon CIBC to establish whether you have been involved in unlawful acts, dishonesty, malpractice or other seriously improper conduct. Any criminal record excerpt that you have provided to us will be kept for 1 month after the employment contract has been signed and will be destroyed afterwards. If you are not offered a position with us, the criminal record excerpt will be destroyed immediately.
15. Further Information: If you have any questions about your rights in relation to your personal data that CIBC processes, or you wish to exercise your rights, you should contact the UK Human Resources department at UKHumanResources@CIBC.co.uk.
16. Complaints: You also have the right to complain to the National Commission on Data Protection ("*Commission Nationale pour la Protection des Données*"). which is responsible for data protection issues in Luxembourg:

Address: National Commission for Data Protection
15, Boulevard du Jazz
L-4370 Belvaux

Tel: (+352) 26 10 60 -1

Website: [National Data Protection Commission - Luxembourg](https://www.cndp.lu/)