

Job Applicant Privacy Notice

Effective date: 20th April 2021

What is the Purpose of this Privacy Notice?

Access Partnership is committed to process any Personal Information we collect in full transparency, in accordance with applicable laws and regulations, and to ensure its accuracy, confidentiality and security.

This Job Applicant Privacy Notice (“**Notice**”) covers all aspects of your interaction with AA Access Partnership Ltd and our affiliates and other entities within Access Partnership group of companies globally acting as a data controller in respect of your personal information (“**Access Partnership**”, “**we**” or “**us**”) in your capacity as an applicant during and after the recruitment process. It applies to all candidates seeking to work for us, whether you are applying to work with us as an employee, worker, contractor, consultant or intern (together referred to herein as “**you**”, “**your**” or “**Individual**”).

This Notice describes the types of Personal Information we collect, the purposes for which we collect that information, how we use it, the other parties with whom we may share it, and the steps we take to make sure it stays private and secure. It also tells you how you can contact us to update your contact information or get answers to questions you may have about our privacy practices – which may vary among the countries in which we operate to reflect local practices and legal requirements. To the extent applicable local laws create additional responsibilities or obligations from those set out in this Notice, we will comply those additional legal obligations.

For the purpose of this Notice, “**Personal Information**” or “**Personal Data**” means any information relating to an identified or identifiable Individual. In connection with your application for work with us, we obtain Personal Information relating to you from various sources described below.

“**Processing**” means any operation or set of operations performed upon Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing will be carried out on paper and by electronic means.

Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, we may not be able to assess your suitability for employment.

Who Is the Data Controller?

Unless otherwise stated below, the entity responsible or “Data Controller” for the purpose of this Notice and the purposes of data protection laws for any Job Applicant data that we receive will be AA Access Partnership Limited, whose registered office and principal place of business is at 105 Victoria Street, 9th Floor, Southside, London, SW1E 6QT, England, UK. This means that we are responsible for deciding how we hold and use personal information about you.

Personal Information We May Collect and Process

We will only collect your information in line with relevant regulations and law. We may collect it from a range of sources, and it may relate to any of the roles you apply for, the role you currently hold or

have held in the past, both within and outside of Access Partnership. Some of it will come directly from you. To the extent permitted under applicable law, your Personal Information may also be collected by us or our service providers (e.g., recruitment agency) from various sources (e.g., former employers, educational institutions, publicly available sources and professional social networking sites, and government agencies).

We may collect and process the following Personal Information about you in the context of recruitment when you inquire about and/or apply for work with Access Partnership:

- Information you elect to provide in your curriculum vitae, application form, covering letter and otherwise during the interview process, this may include: your name, home address, personal email address, education, qualification and work experience details, and references.
- Current and previous employment details (such as salary/bonus and employee benefits schemes, employment with government or regulator, potential conflicts of interests, and other potential restrictions for employment such as non-compete or non-disclosure agreements);
- Academic background (such as your university or school diplomas/certificates and other educational achievements);
- Selection information, including correspondence, interview notes, internal notes, the results of any written or online selection tests (including psychometric testing where applicable)
- Results of any pre-employment check information, including references
- Immigration status and work permits;
- Languages spoken and level of proficiency;
- Job preferences including willingness to travel and/or relocate;
- Any video/photo images or audio recordings that you voluntarily submit to us in connection with your job application;
- Other information required to carry out security checks, such as Photo-IDs
- Special categories of personal data: where you elect to provide this information to us, this may include racial and ethnic origin information, information relating to disabilities and physical or mental health information. We do not require you to submit any special categories of personal data as part of your employment application. If we offer you employment, we may ask you to provide your explicit consent to collect certain special categories of information from you for equal opportunity and diversity monitoring purposes.
- Any other information which you decide to submit to us.

We may also obtain information about you from references you have given, from recruitment agencies (if applicable) and via LinkedIn or other publicly available sources.

We will not necessarily collect, hold, use or share all the types of personal data described in this Notice in relation to you. The specific types of data about you that we will collect, hold, use and share will depend on the role for which You are applying, the nature of the recruitment process, how far you progress in the recruitment process and your individual circumstances. Should your application be successful, when you start work for us, we will provide you with a separate Privacy Notice explaining how we deal with your personal data whilst you are working for us.

How We May Use Your Personal Information

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role;
- Administer your applicant relationship with us e.g. schedule interviews, communicate decisions etc.;
- Carry out your instructions, e.g. send you details of online tests or assessments;
- Manage our relationship with you, including (unless you tell us otherwise) telling you about other roles and services we think may be relevant for you;
- Conduct applicant surveys and data analytics, to better understand our workforce and assist us with succession planning;
- Protect our legal rights and comply with our legal obligations;
- For the purpose of converting an applicant to an employee or contractor

We will only use your information where we have your consent or we rely on one or more of the following legal grounds when we process your ordinary personal data:

- We need it to take steps at your request to enter into a contract with you (entry into a contract), because by applying for a job with us you are effectively asking us to enter into a contract with you, whether this is an employment contract, a contract for services or another type of contract.
- We need it to comply with a legal obligation (legal obligation), e.g. the obligation not to discriminate during our recruitment process, or the obligation not to employ someone who does not have the legal right to work in the country.
- It is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (legitimate interest). For example, it is in our legitimate interests to review and consider your personal data (as listed above) so that we can select the most appropriate candidate for the job.

We only ask you to provide personal data that we need to enable us to make a decision about whether or not to offer you a role. If you do not provide particular information to us, then we will have to make a decision on whether or not to offer you a role without that information, which in some cases could result in us deciding not to recruit you.

How we Use Particularly Sensitive Personal Information

"Special categories" of particularly sensitive personal information require higher levels of protection. We will use your particularly sensitive personal information in the following ways:

- We will use information relevant to any request by you for adjustments to the recruitment process as a result of an underlying medical condition or disability. We use this information to enable us to carry out a fair, non-discriminatory recruitment process by considering/making reasonable adjustments to our process as appropriate. Our additional legal ground for using this information is that we need it to comply with a legal obligation/exercise a legal right in relation to employment – namely, the obligations not to discriminate, and to make reasonable adjustments to accommodate a disability – and such use is in line with our Data Protection Policy.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, to ensure meaningful equal opportunity monitoring and reporting.

How We Share Your Personal Information

Access Partnership Ltd

9th Floor, Southside

105 Victoria Street

London SW1E 6QT

United Kingdom

Tel : +44 (0) 20 3143 4900

Fax: +44 (0) 20 8748 8572

www.accesspartnership.com

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We may disclose and share some of your Data with the following entities during the recruitment/ pre-hire processes:

- Companies of the Access Partnership Group. We routinely share your Personal Data with members of our international group of companies where required to run global processes, carry out group-wide reporting, or make decisions about hires or promotions.
- Third Party suppliers. We use a number of third party suppliers to help us provide business services. These third parties may have access to or merely host your Personal Data, but will always do so under our instruction and subject to a contractual relationship.
- Regulators & Government agencies (for example, Tax or Social Security Authorities). We might be required to share your Data in response to orders or requests from judicial courts, regulators, government agencies, or parties to a legal proceeding or public authorities; or to comply with regulatory requirements; or as part of a dialogue with a regulator.

Some third parties to whom we may provide Personal Data, for instance background checking providers (where this is allowed by the law), are data controllers in their own right, and you should refer to their own Privacy Notices and policies in respect of how they use your Personal Data.

Your Rights and Choices

You have certain rights regarding the Personal Information we maintain about you and certain choices about what Personal Information we collect from you, how we use it, and how we communicate with you. Those rights may be limited in some circumstances by local law requirements. Depending on your country, you may have the right or choice to:

- The right to access information we hold about You and to obtain information about how we process it;
- In some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;
- In some circumstances, the right to receive certain information you have provided to us in an electronic format and / or request that we transmit it to a third party;
- The right to request that we rectify your information if it's inaccurate or incomplete;
- In some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it;
- The right to object to, and to request that we restrict, our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we're entitled to continue processing your information and / or to refuse that request.

You can exercise your rights by contacting us using the details set out in the 'How to contact' section below. Where applicable, you also have a right to complain to the data protection regulator in the country where you live or work.

Please be aware, that if you exercise your right to object or your rights of restriction or deletion, or if you decline to share certain information with us, we may not be able to assess your application.

How We Protect Your Personal Information

The security of your Personal Information is important to us. We are committed to protecting the information we collect. We maintain reasonable administrative, technical and physical safeguards designed to protect the Personal Information you provide or we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. In addition, we limit access to

your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. Third parties will only process your personal information on our instructions and we further contractually ensure that any third party processes your Personal Data in a secure way, in order to safeguard its Confidentiality and Integrity.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

We also take measures to delete your Personal Information when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period.

Data Transfers

The global nature of our business means that we may transfer the Personal Information we collect about you to recipients in countries other than the country in which you work/are applying to work, including the United States. Some of the territories your Data will be accessed from may not provide an equivalent level of protection to them as to that in which you reside/in which you initially provided the information. Your Personal Data may also be processed by third party service providers acting on our behalf. Certain suppliers and service providers may also have personnel or systems located outside the country in which you work/are applying to work. When we transfer your Personal Information to other countries, we take steps to ensure that the Data collected under this Privacy Notice are processed according to the provisions of this Notice and the requirements of applicable law wherever the Information is located.

For European Citizens

When we transfer Personal Information outside of the European Economic Area, within territories (including the USA) which may not offer an equivalent of protection to privacy as applicable within the EEA and Switzerland, we will take steps to verify that your Personal Data receives an adequate level of protection.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data Retention

We retain your Personal Data only for as long as necessary to fulfil the purposes under this Privacy Notice for which the Personal Data was collected and for a period thereafter as legally required or permitted by applicable law (including, for the purpose of meeting any legal, accounting or other reporting and regulatory requirements or obligations).

We will retain your personal information for a period of 12 months after we have communicated to you our decision if you have been unsuccessful in your application. We retain your personal information for that period on the basis that a further opportunity may arise in future and we may wish to consider you for that. We will also retain your personal information for this period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

How to Contact Us

If You have any questions or complaints in relation to the use of your personal information, or this Notice, you may contact us in one of the following ways:

- By sending an email to recruitment@accesspartnership.com
- Or by writing a letter to our HR Department

Updates to This Privacy Notice

Please note that we may periodically make changes to this Notice to reflect changes in our legal obligations, or to reflect changes in our privacy practices.

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