

RECRUITMENT PRIVACY NOTICE

As Part of any recruitment process, we collect and process personal data relating to job applicants. Clements Worldwide is committed to transparency about how we collect and use that data, including ensuring we comply with legal obligations relation to data protection.

What personal data do we collect?

Through the recruitment process, we collect a range of personal data about applicants. This can include:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

This information may be collected directly (where we act as the data controller), or through a recruitment agency (where we are considered the data processor). Personal data may be obtained from CVs, passports or other identity documents, or collected through interviews or tests as part of the recruitment process.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be "sensitive personal data".

Why do we process personal data?

We have a legitimate business interest in processing data, in order to assess your suitability for future employment with the Company and decide to whom we should offer a role. We may also need to process data to ensure that we are complying with our legal obligations. For example, checking a successful applicant's eligibility to work in the UK before employment starts. We process health information if we need to make reasonable adjustments to the recruitment process for applicants who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, the organisation will keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

Where is information stored?

Data will be stored in a range of different places, including application forms, in HR management systems, and on other IT systems (including email).

Who has access to data?

Your personal data may be shared internally only for the purposes of recruitment and employment. This includes members of our HR and Finance teams, hiring managers, and staff (interviewers) who are involved in the recruitment process. IT staff will also have access to your

data, as it is necessary for the performance of their roles. We will only share your personal data with third parties after a job offer to you has been made. We will then share your data with third parties, such as former employers to obtain references, employment background check providers to obtain necessary background and criminal records checks. We may transfer your personal data outside the European Economic Area (EEA), but internally within our global offices, located in Washington, DC, who may be involved in the recruitment process, and as part of our internal processing to ensure accurate record keeping. Where necessary these transfers are covered by the intra-group transfer agreement and model clauses.

How long do we keep your personal data?

If your application for employment is unsuccessful, we will hold your data on file for six months after the end of the relevant recruitment process. If you agree to allow the organisation to keep your personal data on file, we will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, 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.

How do we protect data?

We take the security of your 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 rights

As a data subject, you have a number of rights. At any point while we are in possession of or processing your personal data, you have the rights to:

- have access, request, and obtain a copy of your data;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please complete a "Subject Access Request" form, which can be found on our Namely platform or contact Human Resources. If you believe that the organisation has not complied with your data protection rights, you may file a complaint with the Information Commissioner.

This notice does not form part of any contractual relationship between the Company and a job applicant. This notice can be changed at any time.

Legal grounds for processing personal data

What are the grounds for processing?

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised certain grounds as Legal obligation and Legitimate Interests and outline what those terms mean below.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.

Processing sensitive personal data

If we process sensitive personal data about you, as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies (see below), including that the processing is for equality and diversity purposes to the extent permitted by law.

In outline, these include:

- Processing being necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
- Processing relating to data about you that you have made public (e.g. if you tell colleagues that you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity;
- Processing for equality and diversity purposes to the extent permitted by law.

Further information on the data we process and our purposes

Examples of the data and the grounds on which we process data are in the table below. The examples in the table cannot, of course, be exhaustive.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or background checks and any information connected with your right to work in the UK. If relevant, we may also process information concerning your health, any disability and in connection with any adjustments to working arrangements.	Contract Legal obligation Legitimate interests
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin	Contract Legitimate interests
Security	CCTV images	Legitimate interests
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age	Legitimate interests

Your personal data may be disclosed to managers, HR and administrators for employment, administrative and management purposes as mentioned in this document. We may also disclose this to other members of our group.

Access to your personal data and other rights

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, simply complete a "Subject Access Request" form or contact Human Resources.

You also have a legal right to make a "subject access request". If you exercise this right and we hold personal data about you, we are required to provide you with information, including a description of the personal data, and an explanation of why we are processing it.

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.