

MCARTHURGLEN™

GROUP

CANDIDATE DATA PROTECTION

&

PRIVACY NOTICE

United Kingdom

Introduction

McArthurGlen Group respects the privacy of all candidates and is firmly committed to protecting the personal information candidates share with us when applying for employment opportunities at McArthurGlen Group. We collect, use and, when necessary, share your data with third parties for management purposes, undertaking background, employment history and reference checks, equal opportunities monitoring and updating you about new job opportunities and relevant recruitment events within our portfolio.

This privacy notice describes how we collect and use personal information about you when applying for employment opportunities at McArthurGlen Group, in accordance with the General Data Protection Regulation (GDPR). If you have any questions or concerns about how or why your data is being processed that is not covered within this privacy notice please do not hesitate to contact our Data Protection Team at dataprotection@mcarthurglen.com, who will be happy to assist.

In this notice, where we refer to "**McArthurGlen**", "**we**", "**us**", "**our**", this means the McArthurGlen Group Company or Group Companies responsible for processing your personal data.

McArthurGlen UK Limited is the primary controller of personal data for the McArthurGlen Group, but there will be circumstances where McArthurGlen UK Limited and the relevant McArthurGlen Group Company or Companies act as joint controllers. "Joint controllers" jointly determine how and why we process your personal data.

"**Group Company**" means McArthurGlen UK Limited, McArthurGlen UK Limited's parent company or any direct or indirect subsidiaries of the parent company (and 'Group Companies' is interpreted accordingly). Our Group Companies include the subsidiary management companies operating in each of our locations.

Data protection principles – Understanding the basics?

The GDPR requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

As "data controller" McArthurGlen is responsible for deciding how we hold and use your personal information and we are required to notify you of the information contained in this privacy notice. This notice applies to candidates for potential employment and does not form part of any contract of employment or other contract to provide services. We may update this notice from time to time.

The kind of information we hold about you – what is personal data?

Personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are also "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information **you choose to share with us** including:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses (e.g. for management).
- Date of birth (e.g. for management).
- Gender (e.g. for equal opportunities monitoring).
- Location of employment or workplace (e.g. for management).
- Recruitment information (including copies of right to work documentation, references, qualification/s and other information included in a CV or cover letter or as part of the application process) (e.g. for management).
- Employment history records (including job titles, work history, working hours, training records and professional memberships) (e.g. for management).
- Compensation history (e.g. for management).

We may also collect, store and use the following "special categories" of more sensitive personal information which you have provided directly or indirectly to us:

- Information about your race or ethnicity, religious beliefs and sexual orientation (e.g. for equal opportunities monitoring).
- Information about your health (e.g. for management, health and safety and the provision of reasonable adjustments for interviewing).
- Information about criminal convictions and offences (e.g. for management). Please note we will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us

How is your personal information collected?

McArthurGlen collects personal information about candidates through the application and recruitment process, either directly from candidates or from an employment agency or background check provider. In certain circumstances we will collect additional information from third parties including former employers and background check agencies.

If the candidate is employed by McArthurGlen, then we will collect additional personal information during the recruitment process and in the course of job-related activities throughout the period of you working with us.

How we will use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to consider your suitability for an employment position and ability to perform an employment contract (should we decide to employ you).
2. To communicate with you about the recruitment process.
3. For our records related to our hiring processes.
4. Where we need to comply with a legal obligation.
5. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).

2. Where it is needed in the public interest or for official purposes or when legally required to do so.

Situations in which we will use your personal information?

McArthurGlen need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations as an employer. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below.

<ul style="list-style-type: none"> • Making a decision about your recruitment or appointment. 	Legitimate interests
<ul style="list-style-type: none"> • Determining the terms on which you work for us. 	Performance of contract
<ul style="list-style-type: none"> • Checking you are legally entitled to work in the region of your appointment. 	Legal obligation
<ul style="list-style-type: none"> • Business management and planning, including accounting and auditing. 	Legitimate interest
<ul style="list-style-type: none"> • Making decisions about salary and compensation. 	Legitimate interest
<ul style="list-style-type: none"> • Assessing qualifications for a particular job or task. Education, training and development requirements. 	Legitimate interest
<ul style="list-style-type: none"> • Ascertaining your fitness to work. 	Legitimate interest
<ul style="list-style-type: none"> • Complying with health and safety obligations. 	Legitimate interest / legal obligation
<ul style="list-style-type: none"> • To prevent fraud. 	Legal obligation
<ul style="list-style-type: none"> • Equal opportunities monitoring. 	Legal obligation

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

How we use particularly sensitive personal information?

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
 2. Where we need to carry out our legal obligations.
 3. We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, disability, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting for our legitimate interests.
 4. We may use information about your physical or mental health, or disability status where it is needed to make reasonable adjustments to the recruitment process, to assess your working capacity on health grounds if we offer you a job, and to ensure your health and safety in the workplace and to assess your fitness to work and to provide appropriate workplace adjustments if employed.
- We may use biometric data as follows: We undertake digital identity verification checks in order to comply with our regulatory obligations. Accordingly, we (or a third party provider on our behalf) will perform cross-referencing checks to establish your identity. For this purpose, our third party identity checking provider processes a live image of you ('a selfie') next to other key identifiers, like your name, as shown on the identity documentation you also

provide. As biometric data is particularly sensitive personal information, we need your express consent to engage in this processing. You provide us with this consent by selecting the "I confirm consent for verification" box prior to completing the identity verification process.

Information about criminal convictions

If appropriate to the role, we may use information about any criminal offences to assess your suitability for a role, to protect your interests, our interests and third-party interests and where it is necessary in relation to legal claims. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data or to undertake particular identity verification or background checks. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

If you fail to provide personal information?

Failure to provide information when requested may prevent McArthurGlen from effectively considering your suitability for employment at the McArthurGlen Group, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers). McArthurGlen require all information we ask for but understand some data requests may seem more intrusive than others. It is important to McArthurGlen that candidates are comfortable, and we therefore urge that any and all concerns you may have with regards to your data be raised with the Data Protection Officer.

Change of purpose?

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing?

McArthurGlen may have to share your data with third parties, including third-party service providers (see below for more information) and other entities in the group. If your data is shared it will only be processed on our instruction and where the third party has agreed to treat the data as strictly confidential and to keep it secure. 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. If you have applied for a position within one of our centres, your information will be shared with the brands within that centre so that they may contact you about suitable opportunities.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers including contractors, designated agents and background check providers and other entities within our group. The following activities (where relevant) are carried out by third-party service providers: the carrying out of (i) reference, employment history and background checks (ii) right to work checks

(iii) role specific checks such as directorships, sanctions and financial checks. If these role-specific checks are required this will be communicated as part of the interview process. .

How secure is my information with third-party service providers and other entities in our group?

All of our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information only with employees involved in the recruitment process, which may include colleagues from different functions within our group where necessary to assess your application. We do not share candidate personal data for wider group reporting or restructuring purposes.

What about other third parties?

We may share your personal information with third-party providers who support our recruitment process, such as reference or assessment providers. We may also share your information if required by law or in the context of a business sale or transfer where candidate data relevant to the recruitment process may need to be disclosed.

Data security?

McArthurGlen have put in place measures to protect the security of your information. Details of these measures are available in our Data Protection Policy and IT Security Policy.

In the event of a data security breach McArthurGlen will notify you and any applicable regulator where we are required to do so.

Data retention - How long will you use my information for?

McArthurGlen will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available on our website.

Rights of access, correction, erasure, and restriction?

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. Please contact the Human Resources department or Compliance Officer.

Your rights in connection with personal information?

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Team at dataprotection@mcarthurglen.com.

Right to withdraw consent?

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Team. Once we have received

notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice?

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact dataprotection@mcarthurglen.com.