



**CANDIDATE DATA PROTECTION
&
PRIVACY NOTICE
(Canada)**

Last updated: September 2025

Introduction

McArthurGlen Group respects the privacy of job candidates, and it takes steps to protect the personal information candidates share with us when applying for employment opportunities. We collect, use and, when necessary, share your data with third parties for the purposes of: evaluating your suitability for employment; if you are selected for an employment opportunity, determining the terms of employment we will offer to you, as well as establishing and managing our employment relationship with you; undertaking background, employment history and reference checks; equal opportunities monitoring; complying with our legal obligations; 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 individuals located in Canada, when they apply for employment opportunities at McArthurGlen Management Vancouver Limited. 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 your personal data.

For the purposes of the General Data Protection Regulation ("**GDPR**"), McArthurGlen UK Limited is the primary controller of personal data for the McArthurGlen Group, but there will be circumstances where McArthurGlen UK Limited and McArthurGlen Management Vancouver Limited 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, including McArthurGlen Management Vancouver Limited.

Data protection principles – Understanding the basics

The data protection laws in the jurisdictions where we operate generally require 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.
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", under the GDPR, 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. Similarly, under the British Columbia *Personal Information Protection Act* ("**BC PIPA**"), we are responsible for personal information under our control, and we are required to inform you of our purposes for collecting your information. 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/information?

Personal data or personal information means any information about an individual from which that person can be identified. It does not include anonymous data where the individual cannot be identified, directly or indirectly, alone or together with other information. There are also "special categories" of more sensitive personal data under the GDPR, which specifically 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).
- Age range (e.g. for equal opportunities monitoring).
- 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).
- Government ID and/or biometrics (e.g., to verify identity if offered employment).
- 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, sexual orientation and political opinions (e.g. for equal opportunities monitoring). It will always be optional for you to provide this information, and it will only be collected with your voluntary, express consent.
- Information about your health (e.g. for the provision of accommodations in the interviewing and hiring process, where needed).
- 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 (typically after a conditional offer of employment has been made) or we may be notified of such information directly by you in the course of you working for us. We will obtain your express consent prior to collecting this information.

Provision of any personal information that is not necessary to evaluate your suitability for employment, establish or manage the employment relationship, or comply with our legal obligations is optional (whether or not it is a special category of information under the GDPR), and no negative inference or implications will result from your decision not to provide such information.

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 your ability to perform an employment contract (should we decide to employ you).
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests in connection with establishing, managing or terminating an employment relationship with you, after providing you with an appropriate notice, and provided that your interests and fundamental rights do not override our interests.

We may also use your personal information in the following situations, which are likely to be rare, when permitted to do so by applicable law:

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 the categories of information in the list above to evaluate your suitability for employment and comply with our legal obligations as an employer, and if we choose to offer you employment, to determine the terms and conditions of such offer and subsequently establish and manage our employment relationship with you. In some cases, where permitted by applicable law, 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. However, when required by applicable law, we will obtain your consent before using your information for any purpose other than to establish, manage or terminate an employment relationship with you.

The situations in which we will process your personal information are listed below. For each processing activity, we have also provided the legal basis for McArthurGlen UK Limited to process your personal information under the GDPR. For the purposes of BC PIPA, we may collect, use and share your personal information for the purposes below to the extent reasonable for the purposes of establishing, managing and/or terminating an employment relationship between you and McArthurGlen. If we wish to use your personal information for another reasonable purpose, we will notify you in advance pursuant to BC PIPA.

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

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

How do we use sensitive personal information?

Sensitive personal information requires higher levels of protection, including (without limitation) the "special categories" of particularly sensitive information identified in the GDPR. We may process sensitive personal information (including the special categories under the GDPR) only where it is needed and permitted under applicable law. This may include one or more of the following circumstances, subject to relevant legal requirements and considerations:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations, and in line with our data protection policy.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
5. Where otherwise permitted by applicable law, including for reasonable purposes related to establishing, managing or terminating our employment relationship with you (provided that we have given advance notice in accordance with such laws).

Our obligations as an employer?

We may use your sensitive personal information in the following ways:

- We may use information about your health for the provision of accommodations in the interviewing and hiring process, where needed.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, with your voluntary and informed consent, to ensure meaningful equal opportunity monitoring and reporting.

- We may use information about any criminal offences to the extent permitted by applicable laws, 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 may use your government ID and/or biometric information, to the extent permitted by applicable law, to verify your identity if you are offered employment with McArthurGlen.

Do we need your consent?

Under BC PIPA, we do not generally need consent to process sensitive personal information where such processing is reasonable for the purposes of establishing, managing or terminating an employment relationship between you and McArthurGlen. However, we provide you with advance notice of our collection, use or disclosure of your information, including the purposes for such collection, use and disclosure (including by way of this Candidate Data Protection & Privacy Notice (Canada)).

Under the GDPR, 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 sensitive data, or to process your personal information for certain purposes including to undertake certain identity verification or background checks. If we do so, we will provide you with full details of the information that we would like to collect 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). However, we understand that 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.

As noted above, provision of any personal information that is not necessary to evaluate your suitability for employment, establish or manage the employment relationship, or comply with our legal obligations, is optional (including completion of any surveys intended to support our diversity and inclusion efforts).

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 a purpose that has not already been identified to you, we will notify you and we will explain the legal basis which allows us to do so.

Please note that, despite the above, we may process your personal information without your knowledge or consent, 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 Group Companies. 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, or where it is necessary to establish or administer our relationship with you and you have been provided with any required notices under applicable law.

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 relevant Group Companies. 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?

Our third-party service providers and Group Companies are required to take appropriate security measures to protect your personal information in line with our policies. We do not generally 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 Group Companies?

We will share your personal information with other Group Companies as reasonably necessary for the purposes of establishing, managing or (where applicable) terminating your employment relationship with us. This may include, to the extent permitted by applicable law, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?

We may share your personal information with other third parties where permitted by applicable law (and subject to compliance with any relevant requirements under such laws), for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security?

McArthurGlen have put in place measures to protect the security of your information. Further information about such measures can be obtained by contacting us at dataprotection@mcarthurglen.com.

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, and for such period as it is necessary for legal or business purposes.

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 the recruitment process. 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. We will respond to your request in accordance with the requirements of applicable law.

Right to withdraw consent?

In the limited circumstances where you may have provided your consent to the collection, use, or disclosure 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. We will respond to your request to withdraw consent in accordance with applicable laws.

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 that impact you or your personal information. 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.