



Recruitment Privacy Notice

Introduction

R3 HoldCo LLC, and its subsidiaries and affiliates (“R3”, “us” or “we”) are committed to protecting the privacy and security of your personal data. This privacy notice describes how we collect and use personal data about you during the recruitment process, in accordance with applicable data protection legislation and only applies to the personal data of job applicants and potential candidates for employment. R3 may also collect and process your personal data should we engage in due diligence related to a potential corporate acquisition of your current employer (e.g., if you are part of the senior leadership team of a target company). This Privacy Notice does not apply to our employees, contractors or clients, or other personal data that R3 collects for other purposes.

As used in this Privacy Notice, “personal data” means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the online application and/or through alternative channels (e.g., via professional recruiting firms).

By submitting your personal data to us, you acknowledge that:

- You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- Your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice.
- You are not required to provide any requested information to us, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by R3.

What information do we collect?

In connection with your application for work with us, we will collect, store, and use the following categories of personal data about you:

- The information you have provided to us in your curriculum vitae and covering letter/email;
- Any information you provide to us during an interview; and
- Information you provide in relation to your right to work documentation.

We may also collect, store and use the following “special categories” of more sensitive personal data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health, including any medical condition, health and sickness records; and
- Information about your criminal record.

We collect this personal data from the following sources:

- You, the candidate;
- Recruitment agencies;
- Search consultants;
- Our employment background check provider,
- Our credit reference agency;
- Your named referees; and
- Data from third party publicly accessible sources.

Social Media Tools



Where our recruitment process allows you to pull relevant information from social media websites (such as LinkedIn) into your application form. If you choose to feed any personal data from such social media tools, it will be used in accordance with this Privacy Notice.

Why do we process personal data?

We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check your eligibility to work in the country where your role will be based before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from you allows us to manage the recruitment process, assess and confirm your suitability for employment and decide to whom to offer a job.

We process health information if we need to make reasonable adjustments to the recruitment process for you. This is to carry out our obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. We use a third party to do this on our behalf and may receive a copy of their report if you have consented for us to do so.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to data?

Your information will be shared internally within the R3 group of companies for the purposes of the recruitment process. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you, our employment background check provider to obtain necessary background checks, including a criminal record check and our credit reference agency. All our third-party service providers are required to take appropriate security measures to protect your personal data.

How do we protect data?

We take the security of your data seriously. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.



For how long do we keep data?

If your application for employment is unsuccessful, we will hold your data on file for six (6) months after the end of the relevant recruitment process. After this period, we will securely destroy your personal data in accordance with our data retention policy.

If we wish to retain your personal data on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal data for a fixed period on that basis.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us 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 we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact either a member of the HR team or privacy@r3.com.

If you believe that we have not complied with your data protection rights, you can complain to the local data protection authority in the country that you are based in.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Automated decision-making

Recruitment processes are not based solely on automated decision-making.

Changes and queries related to this Privacy Notice

We reserve the right to update this privacy notice at any time. If you have any questions about this privacy notice, please contact r3@privacy.com.