

Project 1972 Inc.
EEA and UK Recruitment Privacy Notice

Last updated: April 13, 2022

1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. **It is important that you read all of this Notice carefully as it sets out how Project 1972 Inc. ("Chief", "we" or "us") handles your personal information when you apply for a job or other role with us and the rights you have in connection with that information.** The term "**applicants**" is used in this Notice to refer to anyone who applies for a job role, or who otherwise seeks to carry out work with or for us (whether on a permanent or non-permanent basis).

If you are in any doubt, or have any comments or questions about this Notice, please contact us using the contact details set out at Section 9 below.

2. Types of personal information we collect when you apply

Information that we collect automatically

You can visit the recruitment section of our website [<https://chief.com/careers>] ("**Website**") and search for jobs without providing personal information. However, we do collect certain information automatically from your device when you visit our Website. For further information, please see the privacy notice that applies to the use of our Website [<https://chief.com/privacy>].

Personal Information collected from you

The types of personal information we collect and process when you apply for a role with Chief includes (but is not limited to):

- Identification data and contact details – including your name, address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)).
- Employment history – such as previous employers and job titles/positions.
- Background information – such as academic/professional qualifications, job qualifications, education, details included in your CV/résumé (which might include details of any memberships or interests constituting sensitive personal information), transcripts and employment references.
- Nominated referees (including their name, contact details, employer and job role).
- Immigration/visa status.

- Previous applications/roles (information relating to previous applications you have made to the Chief's group and/or any previous employment history with the Chief's group).
- Other information you voluntarily provide throughout the process, including through assessment centers / exercises and interviews.

During the recruitment process, we do not collect or process any of the following: information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health/sex life ("**Sensitive Personal Information**"), unless authorised by law or where necessary to comply with applicable laws.

However, in some limited circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role.

Personal information collected from other sources

The types of personal information we may collect from other sources when you apply for a role with Chief include (in each case, where permissible and in accordance with applicable law):

- References provided by referees.
- Other background information provided or confirmed by academic institutions and training or certification providers.
- Information provided by background checking agencies and other external database holders (for example credit reference agencies and professional / other sanctions registries).
- Information provided by recruitment or executive search agencies.
- Information collected from publicly available sources, including any social media platforms you use or other information available online.

(in each case, where permissible and in accordance with applicable law).

3. Purposes for processing personal information

We collect and use this personal information primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference checks or background checks (where applicable) and to generally manage the hiring process and communicate with you about it.

4. Who we share your personal information with

We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

Transfers to other group companies

We will share your personal information with other members of the Chief's group around the world in order to administer our recruitment processes, help reach hiring decisions and store data.

Transfers to third party service providers

We may also make certain personal information available to third parties who provide services relating to the recruitment process to us, including:

- recruitment or executive search agencies involved in your recruitment;
- background checking or other screening providers and relevant local criminal records checking agencies, e.g. Sterling;
- data storage, shared services and recruitment platform providers, IT developers and support providers and providers of hosting services in relation to our careers website, e.g. Greenhouse;
- third parties who provide support and advice including in relation to legal, financial / audit, management consultancy.

Transfers to other third parties

We may also disclose personal information to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant;
- In response to lawful requests by public authorities (including for tax, immigration, health and safety, national security or law enforcement purposes);
- As necessary to establish, exercise or defend against potential, threatened or actual legal claims;
- Where necessary to protect your vital interests or those of another person;
- In connection with the sale, assignment or other transfer of all or part of our business; and/or
- Where you have provided your consent.

5. Legal basis for processing personal information

Our legal basis for processing your personal information as part of the recruitment process will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you:

- Where it is in our legitimate interests (which are not overridden by your data protection interests or fundamental rights and freedoms); and/or
- to take steps prior to entering an employment contract with you, where you are considered for employment.

If we ask you to provide personal information to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided in Section 9 below.

6. Transfers of personal information abroad

As we operate at a global level, we transfer your personal information to countries other than the ones in which the information was originally collected. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). When we export your personal information to a different country, we take steps to ensure that such data exports comply with applicable laws and we implement appropriate safeguards to require that your personal information remain protected.

Specifically, our group companies, affiliated companies and third party service providers operate around the world and we transfer your personal information from the European Economic Area or the UK to the United States. This means that when we collect your personal information we may process it in any of these countries. In these cases, we enter into agreements ensuring appropriate and suitable safeguards for the international transfer of your personal information, incorporating the European Commission's Standard Contractual Clauses (under Article 46.2 of the General Data Protection Regulation) and the UK Addendum to the Standard Contractual Clauses (where applicable) or taking other measures to provide an adequate level of data protection under applicable law. If you wish to see details of these safeguards, please email privacy@chief.com.

7. Data retention periods

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally this means your personal information will be retained:

- if you are successful in our application with us, in accordance with the retention periods set out in Chief's Employee Privacy Notice (where you become our employee); or
- for a maximum period of 2 years after confirmation that your application was unsuccessful unless you request that we delete your application.

8. Your data privacy rights

You may exercise the rights available to you under applicable data protection laws as follows:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided below.
- You can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided below.
- If we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

9. Contact details

Please address any questions, requests and/or complaints relating to this Notice to recruiting@chief.com.

The Data Controller of your personal information will be the entity to whom you are submitting your application: Project 1972 Inc.