

FIVE RINGS – JOB APPLICANT DATA PRIVACY NOTICE

As part of any recruitment process, Five Rings LLC (“**Five Rings**”, “**the company**”, “**we**” or “**us**”) collects and processes personal data relating to job applicants, in its capacity as a “data controller”. We are committed to protecting the privacy and security of your personal data, which is any information that is capable of identifying you as an individual person, being transparent about how we collect and use your data, and meeting our data protection obligations. This notice describes how we handle and protect your personal data in connection with Five Rings’ recruiting processes and programs.

What information do we collect?

In connection with your application for work with us, the personal data we may collect from you includes:

- contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- evidence of how you meet the requirements of the job, including CVs/resumes and references, together with details of your qualifications, skills, experience and employment history;
- information about your entitlement to work in the location of the vacancy and immigration status;
- records of correspondence regarding the position or the recruitment process, and any information you provide to us during an interview;
- information about your current level of remuneration, including benefit entitlements;
- equal opportunities monitoring information, including information about your racial or ethnic origin, sexual orientation, disability status, veteran status, health and religion or belief; and
- disability information so that we can make reasonable accommodation during the recruitment process.

How do we collect personal data?

We collect personal data about job applicants from a variety of sources, which typically include:

- You, the applicant (for example when you provide information as part of your application or during the recruitment process);
- Recruitment agencies (if applicable for your application), which may share, among other things, your CV/resume, name, address, date of birth, previous roles, reasons for wanting to change roles or work;
- Immigration authorities, from which we collect details of your right to work or live in a particular country; state/governmental authorities, from which we collect criminal records history; and background checking agencies and other external database holders eg. professional or sanctions registries, in each case, subject to applicable laws;
- Your named references, from whom we collect reference details such as your previous employer/contractor, details of the role or work carried out by you in the past, and the dates during which you were employed or carried out that work (only to the extent we are permitted to contact your referees and collect such information from them); and

- Publicly accessible sources, for example, LinkedIn, or other business or employment-oriented services that operate via websites where you have added information about yourself; and social media platforms and publications which you have written/contributed to, and which are publicly available.

How we will use information about you and on which legal bases we rely

We will primarily use the personal data we collect about you to:

- assess your skills, qualifications, and suitability for the role applied for (and also for other roles not yet applied for that we may consider suitable for you);
- carry out reference checks;
- conduct background checks and screenings against relevant sanctions lists, as permitted by applicable law;
- communicate with you about the recruitment process;
- keep records related to our hiring processes;
- conduct statistical data analyses and carry out any relevant benchmarking; and
- comply with legal and/or regulatory requirements.

When we collect and process your personal data during the recruitment process, we rely on the following legal bases:

- **Legitimate Interest:** We (and relevant third parties) 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 may also need to process data from you to respond to and defend against legal claims.
- **Contract:** We may need to process your personal data to decide whether to enter into a contract of employment or engagement with you, and in order to enter into such a contract with you.
- **Legal Obligation:** We may need to process your personal data to ensure that we are complying with our legal or regulatory obligations. For example, we may process health information in order to consider whether to make or provide reasonable accommodation during the recruitment process, in compliance with our obligations under employment or other applicable laws.
- **Consent:** In certain circumstances we may be required to seek your consent to collect and process your personal data. For example, we may seek your consent to process equal opportunities monitoring information to ensure meaningful equality of opportunity monitoring and reporting. You will have full control over your decision to give or withhold consent for such processing, and consent, once given, may be withdrawn at any time.

Who has access to the data?

Internal

Your information will be shared internally for the purposes of the recruitment exercise. This includes, but is not limited to, members of the HC team, hiring managers and interviewers involved in the recruitment process, managers in the business area with the vacancy, senior management and IT staff if access to the data is necessary for the performance of their roles.

Personal data may be shared among different companies within the Five Rings group (for example the Five Rings group company offering the position that you are applying for, or the Five Rings group company where the responsible HC manager(s) or the hiring manager(s) for your application are located) for all processing purposes identified in the section above.

External

We may also share your personal data with third parties for the purposes of processing your application and in accordance with the legal bases mentioned above. Such third parties include, but are not limited to: (i) third party services providers acting on our behalf and/or our instructions (for example applicant tracking system (“ATS”) providers, background checking or other screening providers, relevant local criminal records checking agencies, and recruitment agencies); and (ii) state/governmental authorities (local and foreign), courts, law enforcement agencies, and regulatory bodies to the extent required or permitted by law.

All our third party services providers and all Five Rings group companies are required to take appropriate security measures to protect your personal data. We only permit our third party services providers to process your personal data for specified purposes and/or in accordance with our instructions.

International Transfers

The disclosure of personal data (as described above) may involve international transfers, including transfers to countries that may not have the same level of data protection as your home country. Where necessary, we will take reasonable steps to ensure that adequate safeguards are in place to protect your personal data whenever it is being transferred internationally, to make sure it is treated in accordance with this notice and applicable data protection laws.

How do we store data?

Personal data will be stored in different locations, including electronically: on our servers and cloud-based data storage, in any ATS we use, in our HC management systems and on other IT systems (including e-mail), and in hard copy form: at our offices and those of our group companies.

How do we protect data?

We take the security of your data seriously. We have internal controls in place to protect your data from loss, accidental destruction, misuse, or disclosure, and to limit access to authorised personnel acting in the proper performance of their duties.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

For how long do we keep data?

Subject to applicable law, how long we keep your information will primarily depend on whether your application is successful, the nature of the information concerned and the purposes for which it is processed. As a general principle, we will keep the personal data that we obtain about you during the recruitment process for no longer than is needed, given the purposes for which it is held.

Automated decision making

Solely automated decision making may be used as part of our recruitment process, in the following circumstances:

- when necessary for entering into or performing a contract;
- when authorised by law; or
- with your explicit consent.

For instance, we may ask questions about your experience and/or qualifications, and if they do not match the mandatory requirement for the role, your application may not proceed any further. If you are unhappy with the outcome of an automated decision, you will be able to express your point of view and have the right to contest the automated decision, and to request for human intervention in the decision making process.

Your rights in connection with your personal data

Under certain circumstances, by law you may have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

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.

How you can contact us and your right to complain

If you have any questions about this privacy notice or how we handle your personal data, or would like to exercise any of your rights as set out in the section *“Your rights in connection with your personal data”*, please contact the company’s Compliance Team in writing:

Attn: Compliance Team
Five Rings LLC
225 Liberty Street, 30th Floor,
New York, NY 10281
USA
E-mail: compliance@fiverings.com

Whilst we hope that you will not need to, if you do wish to complain about how we handle personal data, you may contact our Compliance Team. Where you are unsatisfied with the response of the Compliance Team or are unable to get your issue resolved, please be aware that you also have the right to complain to your supervisory data protection authority. However, we ask that you please attempt to resolve any issues with us first although you have the right to contact your supervisory data protection authority at any time.

Changes to this notice

We reserve the right to make changes to this privacy notice, and to notify you in other ways about the processing of your personal data.