

## **Privileged and Confidential Attorney - Work Product**

### **PRIVACY POLICY FOR JOB APPLICANTS AND SUCCESSFUL CANDIDATES**

SEWS-E and its subsidiaries and affiliated companies (collectively, the “**Company**”) strives to properly address applicable data protection and privacy legal requirements.

The primary data controller in respect of your Candidate Data is the entity with which you are applying for employment. Please see Appendix A for a listing of entities.

### **SCOPE**

This Privacy Policy for Job Applicants and Successful Candidates' Data (“**Privacy Policy**”) provides the individuals who apply for employment with and / or who have been offered employment by one of the Company’s subsidiaries and affiliates in the European Economic Area (EEA) ("Job Applicants" and "Successful Candidates" respectively) with certain important information about how the Company handles their personal data ("Candidate Data"). This Privacy Policy does not apply to job applicants or successful candidates located outside of the EEA.

### **TYPES OF CANDIDATE DATA COLLECTED**

Candidate Data is provided by Job Applicants and Successful Candidates, and includes the following types of data:

- Name
- Date of Birth
- Address
- Email Address
- Telephone Number (landline and mobile)
- CV
- Employment history
- Education history
- Referee contacts
- National Insurance Number/ social security number
- Gender
- Nationality
- Place of Birth
- Marital Status

### **PURPOSE OF COLLECTION AND USES, LEGAL BASES, AND DISCLOSURES OF CANDIDATE DATA**

The Company will only use and otherwise process Candidate Data:

- of Job Applicants for recruiting and job placement purposes including notification of future job opportunities; and
- of Successful Candidates for on-boarding purposes, including enrolment in payroll and applicable employee benefit schemes, preparation of employment contract, and other administrative purposes necessary for the Successful Candidate to commence employment with the Company.

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Company's legal bases to use and process Candidate Data include the processing which is necessary for:

- the Company's legitimate interests, including those described above, as processing Candidate Data is necessary to carry out the hiring process and to make it possible for Job Applicants and Successful Candidates to apply for and / or be appointed to a position at the Company;
- compliance with Company's legal obligations, such as accounting and tax requirements;
- the performance of the employment contract between the Company and Successful Candidates;
- for the purposes of carrying out the obligations and exercising rights under employment law; and
- where applicable, on the basis of the consent of Job Applicants or Successful Candidates, which may subsequently be withdrawn at any time by contacting us via the information in the "Contact Information" section, without affecting the lawfulness of processing based on consent before its withdrawal.

As necessary in connection with these purposes, authorized processors and limited members of the Human Resources department, the Finance department, the IT department, and senior executive Company managers may access and otherwise process Candidate Data in connection with their job responsibilities. Some of these personnel may be employed by the Company at our various global locations outside of the EEA, including in countries that may not provide the same level of data protection as the home country of the Job Applicant and Successful Candidate. The Company takes appropriate steps to ensure that such personnel are bound to duties of confidentiality with respect to Candidate Data, and the Company implements measures such as standard data protection clauses to ensure that any transferred Candidate Data remains protected and secure. You can obtain a copy of these clauses by contacting us via the information found in the "Contact Information" section. The Candidate Data are only used and transferred for the purposes outlined in this policy and in accordance with applicable law.

### **TRANSFER TO THIRD PARTIES**

The Company uses third party vendors for certain services.

When Company retains a third-party vendor, that vendor will be carefully selected and required to use appropriate measures to protect the confidentiality and security of personal data.

Some of these third parties are located outside the EEA, including in countries that may not provide the same level of data protection as your home country, such as the United States of America and India. To the extent required by applicable law, the Company will address any applicable requirement to assure an adequate level of data protection before transferring Candidate Data by implementing measures such as standard data protection clauses to ensure that any transferred Candidate Data remains protected and secure. You can obtain a copy of such clauses by contacting us via the information found in the "Contact Us" section.

### **RETENTION OF CANDIDATE DATA**

Candidate Data will be retained only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws.

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When a Successful Candidate enters employment with the Company, his or her Candidate Data may be transferred to an employee personnel file and may be processed and retained in accordance with applicable law or the Company's Data Protection Policy from time to time in force, a copy of which is available on the Company intranet.

### **DATA SECURITY AND DATA INTEGRITY**

The Company maintains reasonable security measures to safeguard Candidate Data from loss, interference, misuse, unauthorized access, disclosure, alteration or destruction. The Company also maintains reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

### **RIGHTS**

Job Applicants and Successful Candidates are entitled to request access to, rectification or erasure of their own Candidate Data or restriction of processing or to object to processing of their own Candidate Data and other rights in accordance with applicable law or Company policy. Requests should be submitted in writing (an email message is acceptable), to the Human Resources department using the information below in the "Contact Information" section.

If a Job Applicant or Successful Candidate is aware of changes or inaccuracies in his or her Candidate Data of which the Company is not aware, he / she should inform the local Human Resources department of such changes so that the Candidate Data may be updated or corrected.

Candidate Data from Job Applicants will be retained on file, to be used for future employment opportunities, subject to applicable law on retention of personal data.

Job Applicants and Successful Candidates may lodge a complaint with a supervisory authority if they consider that Company's processing of their Candidate Data infringes applicable law.

### **DISCLOSURES REQUIRED OR PERMITTED BY LAW**

Regardless of any other provisions in this Privacy Policy, the Company may disclose or otherwise process Candidate Data in the context of any sale or transaction involving all or a portion of the business, or as may be required or permitted by law or required for the purposes of any regulatory audit to which the Company may be subject from time to time.

### **CONTACT INFORMATION**

Job Applicants and Successful Candidates can raise any issues regarding their Candidate Data with their local Human Resources department at

[Location.recruitment@sews-e.com](mailto:Location.recruitment@sews-e.com) e.g [UK.recruitment@sews-e.com](mailto:UK.recruitment@sews-e.com)

or

[PersonalDataManager@sews-e.com](mailto:PersonalDataManager@sews-e.com)

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**Appendix A**

Entity	Registered Address	Company Number
SEWS-E Ltd (including branches- France, Spain, Belgium, Czech Republic	Prospect House, Cemetery Road, Silverdale, Newcastle-under-Lyme, Staffordshire, ST5 6PA	
SEWS-R	Deva, jud. Hunedoara, Calea Zarandului, nr. 166, 330182 , 330182, Romania	
SEWS-P	ul Lesna 1 ,Leszno , 64-100 , Poland	
SEWS-Maroc	Lotissement El Menzeh, Nouvelle Zone Industrielle, Bir Rami,Kenitra , 14090 , Morocco	
SEWS-Egypt	Public free zone area -Port Said ,Part 2,3,4 Side B,Egypt	
SEWS-RUS	4, Pudovkina Str., 119285, Moscow, Russian Federation	
SEWS-Turkey	Esentepe Mah. Ali Kaya Sok. Pol Center A-B Blok K:1 1B 69 Şişli / İstanbul	