

A close-up, shallow depth-of-field photograph showing a person's hands. One hand is holding a black smartphone, while the other is typing on a silver laptop keyboard. The background is bright and out of focus, suggesting a window or a brightly lit office space.

Global Recruitment PRIVACY NOTICE

Global Recruitment Privacy Notice

We take the privacy and security of your personal data very seriously and at all times we will comply with the prevailing laws and regulations governing confidentiality, data protection and security of information. We never sell your personal information to third parties.

This privacy notice explains how we use your personal data in the course of your application for a role with Computershare. It also explains your rights and/or requests in relation to your personal data (where these rights and/or requests may vary based on your location or the location of the role you are applying for) and how you can exercise them.

The processing of your personal data is required for us to consider your application for a role, determine whether you are the preferred candidate for a role and complete any pre-employment checks to determine your suitability for employment. If you do not provide or consent to the collection of these data, we will not be able to complete the application and selection process we will not be able to employ you.

If you have any questions about this privacy notice or how we use your personal data, please contact our People Team by email: peopleservices@computershare.com.

Who we are

Computershare is a global market leader in transfer agency and share registration, employee equity plans, mortgage servicing, proxy solicitation and stakeholder communications. We also specialise in corporate trust, bankruptcy, class action and a range of other diversified financial and governance services.

The entity you are applying for a role with is detailed in the advert for the role or the role profile and is a subsidiary, related company, or entity of Computershare Limited¹. In this document, we will refer to this entity as “we”, “us” or “our”.

What Personal Data do we use?

We may collect or receive (and may have collected or received during the 12-month period prior to the Last Updated date of this Notice) the categories of personal information listed below. Not all categories will be collected for every individual. Appendix 3 contains specifics on regional disparities in the personal data we collect and use.

- Personal details such as your legal full name (and any maiden or previous name) alias, current and previous addresses, nationality, date of birth, disability details, telephone numbers, e-mail addresses, passport, signature, driving license, National Identifier details, Social Security Number, work permit or residence permit;
- Details of your education and qualifications;
- Special category personal data including health information, racial or ethnic origin and disability details;
- Details of your emergency contact(s);
- Details of your employment circumstances such as a history of your roles, absence, salary, pension, benefits information and documented references;
- Recruitment information (including copies of right to work documentation, references and other information included in a CV/resume, cover letter or as part of the application process);
- Information from interviews, assessments and screening checks you may have conducted;
- Financial information including bank account details;
- Information relating to criminal activity (including money laundering), sanctions and information from Fraud Prevention Agencies;
- Credit reference information (where permitted) where this may enable the identification of commercial information including records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies;
- Details of your use of Computershare systems and information regarding your interaction with websites in relation to your application for a role;

¹ US only: the legal entities that serve as an “employer” include LenderLive Network, LLC; Computershare Inc.; and Specialized Loan Servicing LLC.

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- Audio recordings, photographs, and similar information;
- CCTV footage if you visit one of our office locations;
- Biometric (fingerprinting) information where required for employment;
- Biometric (Facial ID - UK employees only) information where photo ID may be compared to a photograph of you to validate your identity;
- Inferences drawn from any of these personal information categories to create a profile about an individual reflecting their preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, or aptitudes;
- Any additional information you provide to us in support of an application.

Where do we obtain your data from?

Much of the personal data we collect will be provided directly by you when you first apply for a role with us or when you communicate with us during the course of your application.

We will also obtain data from the following third parties in the course of your application:

- Recruitment agencies and/or job advertisement boards;
- Credit reference agencies;
- Fraud and crime prevention agencies;
- Individuals or organisations you authorise us to seek references from; and
- Public bodies (such as law enforcement agencies, regulatory authorities or tax agencies).

In addition, we will also collect information about you which can be obtained via open data sources and public records (e.g. the electoral register and information openly available via the internet), although we will only do this where it relates to your application for employment and our assessment of this application.

Sometimes we may request particular information about you. Unless we have already done so we will take reasonable steps to inform you of the purpose for which the information is collected and the main consequences if all or part of the information is not provided.

We manage special category personal data with particular care and will obtain your consent prior to collecting, using, or disclosing your special category personal data, unless the collection of the information is required by law.

How do we use your data?

We use your personal data to:

- validate your identity;
- identify you when you contact us;
- perform credit checks (where permitted);
- perform criminal records checks (where permitted);
- carry out background and reference checks (where and to the extent permitted);
- assess your suitability for a role (including checking you are legally entitled to work in the country you have applied for a job in);
- prevent fraud and assess other relevant conduct;
- respond to enquiries which you make;
- reimburse you for the costs incurred by you in connection with the recruitment process (where relevant);
- keep records relating to our hiring processes;
- monitor the security and usage of IT systems;

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- comply with health and safety obligations;
- perform diversity and equal opportunities monitoring;
- monitor and report compliance with applicable legislation and regulation; and
- manage our business in an efficient and proper manner, including the management of our financial position, our resources, the risks to which we are exposed and the way in which we arrange our internal operations.

If you accept a role with us, the information collected during the recruitment process will become part of your employment record.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

Information about criminal convictions

We envisage that there are occasions where we may process information about criminal convictions where we have a valid legal basis for this processing.

We will collect information about your criminal convictions history where we would like to offer you the role and where we are permitted to do so (conditional on checks and any other conditions, such as references, being satisfactory). Where we are permitted to carry out a criminal records check, we do so in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role you have applied for and/or have been offered.

What are our legal reasons for processing your data?

Where we process your personal data, we need to have a valid legal basis for doing so. In relation to your application, the legal basis for processing your personal data are:

- because the processing is necessary for us to take steps, at your request, to enter into an employment contract with you;
- because it is necessary to comply with a legal obligation. This applies to circumstances where we disclose your information to a public body (such as law enforcement) as well as any processing necessary to comply with financial crime legislation and employment law;
- because you have consented to a specific use of your data and where you are entitled to withdraw your consent to such processing at any time. This may apply if you have consented to us using any of your sensitive or special category data for example for equal opportunities monitoring purposes; or
- because it is necessary for the purposes of our legitimate interests. This applies to circumstances where processing is not necessary for entering into a contract with you such as analysis and reporting to support internal management and governance of our business, IT security and IT Operations. It also applies to circumstances where we disclose your data to Fraud Prevention Agencies for the prevention of fraud and other relevant conduct (UK employees only).

It is your responsibility to obtain approval from referees to the processing of their personal information before providing it to us.

Who do we share your personal data with?

To enable us to process your application and enter into an employment contract with you, we may share your personal data with:

- other Computershare group companies;
- non-Computershare companies to whom we outsource the delivery of some of our services e.g. a communications company or assessment provider;

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- non-Computershare companies who help us with administrative services, including printing, mailing and IT services;
- non-Computershare companies who help us with pre-employment screening and background checking;
- credit reference agencies;
- secure information storage and destruction providers;
- our legal or other professional advisors, including our auditors;
- public bodies (such as law enforcement agencies, regulatory authorities, or tax agencies);
- fraud and crime prevention agencies (including CIFAS (Credit Industry Fraud Avoidance System) for UK employees); and
- courts, to comply with legal requirements, and for the administration of justice.

Transferring your personal data outside the European Economic Area

In the course of your application your personal data may be processed outside of your local jurisdiction.

Where we transfer your personal data outside your local jurisdiction, steps will be taken to ensure appropriate safeguards apply to it, including protecting your data and ensuring you can exercise your rights in relation to your personal data.

How long will we keep your personal data?

We will keep your personal data for as long as we need to for the purposes for which it was collected or (if longer) for any period for which we are required to comply with our legal and regulatory requirements. In the event of an internal secondment or transfer, personal data will be migrated to the jurisdiction an individual is transferred or seconded to.

Where personal data is collected to progress a job application, all data relating to unsuccessful candidates and candidates who did not join the company will be retained until the closure of the application process, in line with our internal global retention policy or unless you provide consent for your data to be held for longer. However, data retention may be justified concerning the same or subsequent vacancy that match the candidate's job profile.

How do we secure your personal data?

Personal information is held in secure electronic databases. We use a range of security processes to protect the confidentiality and security of personal information we hold in line with our global information security standards.

Where your personal data is held in paper form, these data will be physically secured where stored to protect against inappropriate disclosure.

Your Rights or Requests

Depending on your location you may have rights and/or be entitled to make requests in relation to your personal data based on relevant privacy laws. Where applicable we will always support your privacy rights or requests. Privacy rights and/or requests that may apply and where these rights vary by geographic location are outlined below.

Accessing your information

- You may ask for a copy of the personal information we hold about you by contacting us via the below details

Correcting your information

- We try to ensure all of the personal data we hold is accurate. If you find any inaccuracies or if your details change, please notify us promptly and we will correct them.

Erasing or restricting use of your information

- You may ask us to erase or restrict use of your personal information. If you do, we will comply with your request unless there is a legal or regulatory reason for us not to.

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Withdrawing consent

- Where the legal basis for us processing your personal information is that you have given your consent to that processing, you may withdraw your consent at any time. If you do so we will consider the requirement to stop processing your personal data promptly.

Objecting to processing

- You may object to our processing of your personal data where it is based exclusively on our legitimate interests.

Object to selling personal data

- You may have a right or be otherwise entitled to request that we do not sell your personal data. We never sell your personal information to third parties.

To exercise one or more of these rights or requests please contact:

peopleservices@computershare.com

Please note that we may ask you to provide a form of identification verification before we can give effect to any such request made by you. Depending on the nature of the request and the country you reside in, we may charge a fee for this service, and we will inform you of the fee at the time.

Complaints

If you have any complaints about the way we use your personal information, please contact your local Data Protection or Privacy Officer who will try to resolve the issue.

Data Protection and Privacy Officers:

UK and Ireland – dataprotection@computershare.co.uk

Germany - datenschutz@computershare.de

Continental Europe (excl. Germany) - CEDataprotection@computershare.it

Channel Islands – Maureen Cox (Compliance Officer) - Maureen.Cox@computershare.co.je

South Africa - Teresa Van Niekerk (Head of Compliance) - Teresa.Van.Niekerk@Computershare.co.za

US - USCSPrivacy@computershare.com

Canada - PrivacyOfficer@computershare.com

Hong Kong and China – privacyofficer@computershare.com.hk

Australia and New Zealand - privacy@computershare.com.au

India – dataprotection@computershare.co.uk

In Europe you have the right to complain to the data protection supervisory authority in your country.

Denmark: Datatilsynet www.datatilsynet.dk

France: Commission nationale de l'informatique et des libertés – www.cnil.fr

Germany (Munich): Bayerisches Landesamt für Datenschutzaufsicht - www.lida.bayern.de

Guernsey: Office of the Data Protection Commissioner – www.dataci.gg

Ireland: Office of the Data Protection Commissioner - www.dataprotection.ie

Italy: Garante per la protezione dei dati personali – www.garanteprivacy.it

Jersey: Office of the Information Commissioner – www.oicjersey.org

Spain: Agencia Espanola De Proteccion De Datos - www.agpd.es

Sweden: Datainspektionen www.datainspektionen.se

The Netherlands: Autoriteit Persoonsgegevens – www.autoriteitpersoonsgegevens.nl

UK: Information Commissioner's Office – www.ico.org.uk

Finland: Tietosuojavaltutetun toimisto - www.tietosuoja.fi

Switzerland: Federal Data Protection and Information Commissioner - www.edoeb.admin.ch/edoeb/de/home.html

Poland: Office of the President for Personal Data Protection – www.uodo.gov.pl

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Appendix 1 - Credit Reference Agencies

The Credit Reference Agencies which we may use are:

- TransUnion Ltd;
- Equifax Ltd;
- Experian Ltd; and
- Irish Credit Bureau D.A.C.

For further information regarding how credit reference agencies use your data see the Credit Reference Agencies Information Notice, available at:

www.transunion.co.uk/crain;

www.equifax.co.uk/crain;

www.experian.co.uk/crain; and

[www.icb.ie/pdf/Fair%20Processing%20Notice.pdf.](http://www.icb.ie/pdf/Fair%20Processing%20Notice.pdf)

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Appendix 2 - Fraud Prevention Agencies

We and other organisations may access and use your information to prevent fraud.

In the UK we will check your details against the Cifas databases established for the purpose of allowing organisations to record and share data on their fraud cases, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct ("Relevant Conduct") carried out by their staff and potential staff. "Staff" means an individual engaged as an employee, director, trainee, homeworker, consultant, contractor, temporary or agency worker, or self-employed individual, whether full or part time or for a fixed-term.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and other relevant conduct and to verify your identity.

Details of the personal information that will be processed include: name, address, date of birth, any maiden or previous name, contact details, document references, National Insurance Number, and nationality. Where relevant, other data including employment details will also be processed.

We and Cifas may also enable law enforcement agencies to access and use your personal data to detect, investigate, and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and other Relevant Conduct, and to verify identity, in order to protect our business and customers and to comply with laws that apply to us. This processing of your personal data is also a requirement of your engagement with us.

Cifas will hold your personal data for up to six years if you are considered to pose a fraud or Relevant Conduct risk.

Should our investigations identify fraud or any other Relevant Conduct by you when applying for or during the course of your engagement with us, your new engagement may be refused or your existing engagement may be terminated or other disciplinary action taken (subject to your rights under your existing contract and under employment law generally).

A record of any fraudulent or other Relevant Conduct by you will be retained by Cifas and may result in others refusing to employ you. If you have any questions about this, please contact us using the details provided.

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Appendix 3 – Personal Data retained, by Jurisdiction

Personal Data Category	Europe, UK, and Channel Islands	Germany	US	Canada	India	South Africa	Hong Kong, Australia, and New Zealand	China
Personal details such as your legal full name (and any maiden or previous name) alias, current and previous addresses, nationality, date of birth, marital status and dependents, emergency contact details, telephone numbers, e-mail addresses and passport, National Identifier details, work permit or residence permit	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Special Category personal information about minors (dependents) - Ages vary by region	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Details of your education, employment, or employment history	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Special category personal data including health information, mental health, beliefs or health insurance information	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Special category personal data including racial or ethnic origin, sexual orientation	Yes (subject to consent where required)	Yes (subject to consent)	Yes	Yes	Yes (subject to consent)	Yes	Yes	Yes
Religious Beliefs	Yes (subject to consent)	Yes – if required for tax purposes	Yes (subject to consent)	Yes (subject to consent)	Yes (subject to consent)	Yes	Yes (subject to consent)	Yes
Trade Union Membership	Yes (subject to consent)	No	No	No	No	Yes (subject to consent)	No	No (Trade Unions are not allowed in China)

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Personal Data Category	Europe, UK, and Channel Islands	Germany	US	Canada	India	South Africa	Hong Kong, Australia, and New Zealand	China
Details of your employment circumstances such as a history of your roles, absence, salary, pension, benefits information and documented references	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Driving licence details (for use in association with the use of vehicles if required for the role)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Financial information including bank account details	Yes	Yes	Yes	Yes	Yes (subject to consent)	Yes	Yes	Yes
Information relating to criminal activity (including money laundering) and sanctions	Yes	Yes (only for onboarding)	Yes	Yes	Yes	Yes	Yes	Yes
Credit reference information including but not limited to credit history, credit information, transaction and consumption records, money flow records, etc	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
Details of your use of Computershare IT systems and information regarding your interaction with websites or applications	Yes	Yes (for IT Security only)	Yes	Yes	Yes	Yes	Yes	Yes
Audio recordings, photographs, and similar information	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
Details of your access to Computershare property including CCTV footage	Yes	Yes (Detailed in the corresponding works agreement)	Yes	Yes	Yes	Yes	Yes	Yes
Biometric (fingerprinting) information	No	No	Yes	Yes	Yes (subject to consent)	Yes (subject to consent)	Yes (Hong Kong where applicable)	No

