

DP-007-NERPN

AMER, APAC Recruitment Privacy Notice



Version	Date	Description	Prepared by	Approved by
0.1	5/9/2024	First Draft and Release	Oyin Amodu	Manish Kumar
0.1a	17/09/2024	Minor updates	Oyin Amodu	Manish Kumar
0.2	02/05/2025	Minor Layout Changes	Oyin Amodu	Manish Kumar
1.0	25/10/2025	Updates for recent Australian Tort and other minor revisions to Third Party.	Oyin Amodu	Manish Kumar

Data Privacy Team (privacy@baringa.com)

Copyright

Copyright © Baringa Partners LLP 2025. All rights reserved. This document is subject to contract and contains confidential and proprietary information.

No part of this document may be reproduced without the prior written permission of Baringa Partners LLP.

Confidentiality and limitation statement

This document: (a) is proprietary and confidential to Baringa Partners LLP (“Baringa”) and should not be disclosed to third parties without Baringa’s consent; (b) is subject to contract and shall not form part of any contract nor constitute an offer capable of acceptance or an acceptance; (c) excludes all conditions and warranties whether express or implied by statute, law or otherwise; (d) places no responsibility on Baringa for any inaccuracy or error herein as a result of following instructions and information provided by the requesting party; (e) places no responsibility for accuracy and completeness on Baringa for any comments on, or opinions regarding, the functional and technical capabilities of any software or other products mentioned where based on information provided by the product vendors; and (f) may be withdrawn by Baringa within the timeframe specified by the requesting party and if none upon written notice. Where specific Baringa clients are mentioned by name, please do not contact them without our prior written approval.

Table of Contents

Version History

Copyright

Confidentiality and Limitation Statement

1. Introduction	4
1.1. Changes to the privacy statement and your duty to inform us of changes	4
1.2. Purpose of this privacy statement	4
2. The data we collect about you and how we collect it	5
3. How we use your personal data	6
4. Automated decision making	8
5. What happens when you do not provide personal information?	8
6. Data Sharing.....	9
7. Data Security	9
8. Data Transfer	10
9. Data Retention	10
10. Your rights in connection with personal information	10
11. Contact Us.....	11
12. Acknowledgement of receipt	11



1. Introduction

Baringa is committed to protecting your privacy and maintaining the security of any personal information received from you. This policy is designed to ensure compliance with all relevant data protection laws and regulations in the jurisdictions where Baringa Partners operates. In addition to the elements of European General Data Protection Regulation (EU GDPR), the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, the policy complies with various US legislations such as: California Consumer Privacy Act (CCPA), California Privacy Rights Act (CPRA), Colorado Privacy Act (CPA), Connecticut Data Privacy Act (CTDPA), Virginia Consumer Data Protection Act (VCDPA), Utah Consumer Privacy Act (UCPA), Personal Data Protection Act (PDPA) and Australian Privacy Principles (APP's) amongst other applicable data protection legislations.

The purpose of this statement is to explain to you what personal information Baringa Partners LLP, its entities and/or its affiliates ("Baringa", "we", "us" or "our") collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of your home jurisdiction. This Privacy Notice also describes your rights regarding the personal data that we hold about you including how you can access, correct, and request erasure of your personal data. This privacy notice applies to job applicants outside the EU and across the world.

We will only process your personal data in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

This document may be provided to Baringa Group authorised third parties and stakeholders with approval from Baringa's Data Protection Officer.

1.1. Changes to the privacy statement and your duty to inform us of changes

This privacy statement is effective as of 20th October, 2025 and will be updated to reflect any changes in the way we handle your personal data or any changes in applicable laws.

It is important that the personal data we hold about you is accurate and current. Please therefore keep us informed if your personal data changes (or if you wish to verify or remove your personal details) during your relationship with us by contacting us at privacy@baringa.com

1.2. Purpose of this privacy statement

Baringa is a "controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker, or contractor). It makes you aware



of how and why your personal data will be used, namely for the purposes of this recruitment exercise and how long it will usually be retained for. It provides you with certain information that must be provided under the EU General Data Protection Regulation (EU GDPR), California Consumer Privacy Act and other applicable laws.

2. The data we collect about you and how we collect it

Personal data, or personal information, means any information that relates to an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation. Information about criminal convictions also warrants this higher level of protection. We try to minimise the amount of data collected and processed to be limited for the purposes of recruitment only.

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

- **Identity data:** including name, title, address, telephone number, personal email address, date of birth, gender, education information (including degrees awarded, transcripts and; other supporting documents) employment history, qualifications, curriculum vitae, cover letter, supporting information provided during screenings and interview, etc.
- **Contact data:** including residential address, email address, telephone number, reference contact information, etc.
- **Recruitment necessary data:** including type of employment sought, desired salary, willingness to relocate, job preferences, and other information related to compensation and benefits, information received from background checks, where applicable, including information provided by third parties, Information related to previous applications to Baringa Partners or previous employment history with Baringa Partners.
- **Technical data:** including IP address used to connect your computer or mobile device to the internet, browser type and version, operating system and platform and other technologies on the devices you use to access our website.

We may also collect, store and use the following types of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions to identify or keep under review the existence or absence of diversity and inclusion.
- Information about your health, including any medical condition, health, and sickness records.
- Information about criminal convictions and offences.

We use different methods to collect personal data from you, including through:

- **Direct interactions** - For example, when you make an enquiry or submit a job application or when we interact with you during the application phase.



- **Third Party** - We may collect information from third party which include but not be limited to the recruitment agency, credit reference agencies, disclosure and barring service in respect to criminal convictions, named referees.

3. How we use your personal data

We only use your personal data where required for specific purposes. Most commonly, we will use your personal data in the following circumstances:

- To assess your skills, qualifications, and suitability for the position you have applied to.
- To carry out background and reference checks, where applicable, subject to your consent where required by applicable law.
- To communicate with you about the recruitment process and your application.
- To keep records related to our hiring processes for as long as appropriate under the circumstances.
- To comply with legal, regulatory, or other corporate governance requirements.
- To create and tender reports as required by applicable laws and regulations.
- To analyze and improve our application and recruitment process.

It is in our legitimate interests to decide whether to appoint you to the work or role since it would be beneficial to our business to appoint someone to the work or role. We also need to process your personal information to decide whether to enter a contract of employment with you. Having received your CV and covering letter or your application form and the results from any test which you take, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role or work. If we decide to offer you the role or work, we will then take up references and/or carry out a background and reference checks before confirming your appointment. If we decide to not proceed with your application at any stage, then the data will be secured in line with our data retention schedule for appropriate reporting and regulatory purposes.

Special considerations and protection are applied for use of "Sensitive data" or "Special Categories" of Personal Data. We only process these data types where legally required which may include:

- Information about your mental health condition or disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- Information about your race or national or ethnic origin, religious, political belief, philosophical or moral beliefs, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- Information about criminal convictions in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:



- The role in question requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.
- A number of our clients operate in regulated industries that require us to conduct criminal records checks on our employees and contractors.

In addition to using your personal data for the position for which you have applied, we may retain and use your personal data to inform you about and consider you for other positions that may be appropriate for you with your consent. If you want us to consider you for other positions, you may contact us as specified below under Contact Us and we will retain your personal data for that purpose.

We will only process your personal data for the purposes we collected it for or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent only where required by applicable law or regulation.

We may also process your personal data for our own legitimate interests, including for the following purposes:

- To prevent fraud.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.

You will not be subject to hiring decisions based solely on automated data processing without your prior consent.

We do not sell, rent, or exchange your personal information with any third party for commercial reasons. Your data may only be shared with our affiliates or partners where we explicitly inform you of the partner prior to collection of this data. This are limited to co-hosted events, webinars, joint recruitment roadshows or other events.

3.1. Third Party Vendors

We may share your personal data with carefully selected third-party vendors who support our business operations. These vendors provide services such as recruitment, IT support, data hosting, analytics, and other operational functions necessary for the delivery of our services. All third-party service providers are contractually obligated to:

- Process personal data only on our documented instructions.
- Implement appropriate technical and organizational measures to ensure the security and confidentiality of your personal data.
- Refrain from using your personal data for their own purposes.
- Comply with applicable data protection regulations, including California Consumer Privacy Act (CCPA), where relevant.



- Ensure Data stored and processed by any fourth-party will adhere to Baringa's Data Retention Schedule.

We ensure that all data sharing is governed by written agreements that reflect our commitment to safeguarding your personal information. Where necessary, we also implement appropriate compliant data transfer mechanisms to ensure the secure handling of personal data across jurisdictions. A complete and comprehensive list of our current third-party vendors is available upon request. Please contact the Data Privacy Team at privacy@baringa.com to obtain this information.

4. Automated decision making and profiling

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. To proceed with your application, we may require the use of Automated summarization, specialised sorting or other automated processing (including profiling) to improve the efficiency of our processes. We only use automated decision making without human intervention in limited circumstances such as:

1. Where we notified you of the decision and have given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. Where we have previously requested your explicit written consent and where appropriate measures are in place to safeguard your rights.

If an automated decision is to be made with the use of your sensitive personal information, we either receive your explicit written consent, or it must be justified as a public interest with appropriate measures to safeguard your rights in place. Any explicit consent provided for the above can be withdrawn at any time by contacting the recruiter or via email to our Privacy Team.

However, you will not be made subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

5. What happens when you do not provide personal information?

If, for any reason you fail to provide requested information, 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.



6. Data Sharing

We will only share your personal information with the following third parties for the purposes of processing your application: other Baringa group companies and a search or recruitment agency used by us to fill the role. All our third-party service providers and other entities in the Baringa group are required to take appropriate security measures to protect your personal information in line with our policies.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data in accordance with our policies and any data security obligations applicable to us. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies (including outside of our home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to administer the application and recruitment process.
- As part of our regular reporting activities to other members of our group of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- To protect the rights and property of Baringa.
- During emergency situations or where necessary to protect the safety of persons.
- Where the personal data is publicly available.
- If a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction. In these circumstances, we will limit data sharing to what is absolutely necessary, and we will anonymize the data where possible.
- For additional purposes with your consent where such consent is required by law.

7. Data Security

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

8. Data Transfer

We restrict transfer of data outside the UK/EU where possible. Where permitted by applicable law, we may transfer the personal data we collect about you to other jurisdictions that may not be deemed adequate enough to provide the same level of data protection as your home country for the purposes set out in this Privacy Notice. However, we have implemented appropriate compliant Data Transfer Mechanisms to ensure the secure transfer of your personal data to other jurisdictions.

9. Data Retention

We will retain your personal information for a period of up to two (2) years after we have communicated to you our decision about whether to appoint you to the role or work. We retain your personal information for that period on the basis that a further opportunity may arise in future and we may wish to consider you for that or so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

After this period, we will securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

10. Your rights in connection with personal information

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

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information 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 information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Object to decisions based solely on Automated Decision Processing, including profiling.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.



If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Baringa's Data Protection Officer or the privacy team. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. We do not discriminate against individuals for exercising their privacy rights under all applicable data protection laws and regulations. Exercising these rights will not affect access to services, employment status, benefits, or opportunities. We uphold this commitment in line with our legal obligations and core values of fairness and transparency

11. Contact Us

Please do not hesitate to contact us, using the details below, if you:

- have any questions about privacy or this particular statement.
- wish to exercise your rights in relation to your personal data rights.
- wish to make a complaint about our use of your data.

Email address: privacy@baringa.com

Postal address: Baringa Partners

62 Buckingham Gate,
London,
UK SW1E 6AJ

Telephone number: 0203 327 4220

If, despite our commitment and efforts to safeguard your personal data, you have any concerns or complaints about our privacy activities, you can contact the data protection authority in your jurisdiction. We would, however, appreciate the opportunity to deal with your concerns before you approach the authorities so, please contact us in the first instance.

12. Acknowledgement of receipt

I, _____ acknowledge that on _____, I received a copy of Baringa's recruitment privacy notice and that I have read and understood it.