

Effective from August 2019

LINKLATORS
GLOBAL RECRUITMENT PRIVACY NOTICE

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Introduction

1 Scope

This Privacy Notice ("**notice**") explains how Linklaters collects and uses Personal Data during our recruitment and selection processes. It applies to applicants for training contracts, internships, together with applicants for fixed term and permanent vacancies. It also applies to individuals who undertake a period of work experience or a vacation placement or internship with us.

It is important that you read this notice together with any other notices we may provide on specific occasions when we are collecting or processing your Personal Data, so that you are fully aware of how and why we are using your Personal Data. This notice supplements the other notices and is not intended to override them.

The type of Personal Data collected, and how Linklaters will Process your Personal Data may vary from country to country. Schedule 2 sets out some of the country specific variations to this notice. However, this table will be amended and added to as the firm continues to implement new standards of data protection globally across the firm. If you have any questions in relation to this notice or the country specific variations which may apply to you, please email data.protection@linklaters.com.

2 Effective date and document review

This notice is version number three and is effective from 27 August 2019.

This notice will be reviewed and updated as deemed necessary to ensure it continues to be accurate and relevant. For previous versions of this notice please contact data.protection@linklaters.com.

3 Document management

This notice is owned by the HR Team and may only be updated with approval from:

- (a) the Senior Employment Lawyer within HR; or
- (b) the Law & Compliance team.

4 Contact details

- (a) Should you have any questions regarding the use of your Personal Data you should contact data.protection@linklaters.com.
- (b) Our Global Head of Law & Compliance oversees compliance with data protection within Linklaters. If you have any questions about this notice, including any requests to exercise your rights, please contact our Global Head of Law & Compliance using the contact details set out below:

Global Head of Law & Compliance

Linklaters LLP, One Silk Street, London EC2Y 8HQ

Email: data.protection@linklaters.com

Telephone: (+44) 20 7456 2000

Table of contents

Introduction.....	2
1 Scope	2
2 Effective date and document review.....	2
3 Document management.....	2
4 Contact details	2
Table of contents	3
Defined terms used in this notice.....	4
5 Privacy and data protection terms.....	4
6 Other terms with a defined meaning.....	4
7 Importance of Personal Data protection.....	5
8 Who is the controller for the Personal Data processed?	5
9 Collecting your Personal Data.....	5
10 What information we collect.....	5
11 Using your Personal Data.....	6
12 Using your Special Personal Data	7
13 Using your diversity data.....	8
14 Legal basis for using your Personal Data.....	9
15 Updating your Personal Data.....	10
16 Sharing your Personal Data.....	10
17 Securing your Personal Data	10
18 Retaining your Personal Data	11
19 Your rights in relation to your Personal Data.....	11
20 How to make a complaint about the use of your Personal Data by us.....	11
21 Your right to make a complaint to a supervisory authority	12

Defined terms used in this notice

5 Privacy and data protection terms

In this notice:

"Data Protection Standards"	means the Global Standards for Processing Personal Data dated August 2013 (as amended from time to time, including on 21 May 2018), being the standards applicable to Linklaters entities specified in them in relation to processing Personal Data, including as regards the transfer of Personal Data out of the EEA, accessible via the Linklaters.com website (and also under this link);
"European Economic Area" or "EEA"	means, collectively, the member states of the European Free Trade Association and the member states of the European Union;
"GDPR"	means regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data;
"Personal Data"	means information about a living natural person who can be identified from the information. It includes a person's name, opinions about an individual, images, date of birth, address, telephone number, details of family members, or any other information that could allow the person to be identified. Where applicable, references to Personal Data in this notice include references to Special Categories of Personal Data;
"Processing"	means any activity carried out in relation to information including collecting, analysing, storing, transferring, amending, destroying and generally using information;
"Special Personal Data"	(previously known as "Sensitive Personal Data") means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation;

6 Other terms with a defined meaning

In this notice, any reference to:

- (a) **"applicable laws"** means any applicable law, rule or regulation, whether or not having the force of law, but if not having the force of law only if persons to whom any such law, rule or regulation is intended to apply generally comply with it; and

- (b) the "**firm**", "**Linklaters**", **we**" or "**us**" is a reference to all or any of Linklaters LLP, its affiliated firms and any other entities carrying on business outside the United Kingdom under or including the name Linklaters or under joint venture or collaboration arrangements in association with Linklaters LLP. A reference to the "firm", "Linklaters", "we" or "us" does not include the Linklaters alliance partners, however, where stated, certain provisions of this policy may apply to Linklaters' relationship with them for example when Linklaters shares Personal Data with Linklaters alliance partners; and
- (c) a "**Linklaters alliance partner**" means any of Allens, Webber Wentzel and (the Linklaters 'best friend' firm) TT&A.

7 Importance of Personal Data protection

- 7.1** We recognise that the use and disclosure of Personal Data has important implications for us and for the individuals whose Personal Data we process. Most of our offices operate in countries which regulate the use, and impose restrictions on overseas transfers, of Personal Data. To ensure that we handle Personal Data properly, we have adopted a global approach to privacy compliance, as evidenced by our BCRs. A copy of our BCRs is available on our website at the address provided above. Alternatively, you can request a copy of our BCRs at any time by contacting us at data.protection@linklaters.com.

8 Who is the controller for the Personal Data processed?

- 8.1** A "**controller**" is a person or organisation who alone or jointly determines the purposes for which, and the manner in which, any Personal Data is, or is likely to be, processed. This notice is issued on behalf of Linklaters as controller. Unless we notify you otherwise Linklaters is the controller for your Personal Data.

9 Collecting your Personal Data

- 9.1** The Personal Data processed by Linklaters has been, or will be, collected directly from you in order to carry out the purposes stated below at Section 10.1.
- 9.2** We will also collect data from other people when we check your references or carry out any background checks in relation to you. If we do carry out any such checks, we will inform you during the recruitment process of the exact checks that are going to be carried out.
- 9.3** For participants in our internships, vacation schemes and work experience placements we will also collect information about job-related activities and assessments through the course of your placement with us.

10 What information we collect

- 10.1** As a firm, we collect the following Personal Data about you during the recruitment process:
 - 10.1.1** personal contact details such as first name, middle name, surname, title, address, telephone number and personal email addresses;
 - 10.1.2** date of birth;
 - 10.1.3** equal opportunities monitoring information such as in relation to sex/gender, race, nationality, ethnicity, religion, health and sexual orientation;

- 10.1.4 recruitment information, including qualifications, information regarding your professional qualifications, language skills, references and other information in your CV or cover letter or otherwise provided as part of your application process;
 - 10.1.5 bank account details;
 - 10.1.6 information about your health, including any medical condition, health and sickness records to the extent that you require adjustments to be made to our assessment and interview processes;
 - 10.1.7 information regarding your right to work in the jurisdiction in which you have applied;
 - 10.1.8 information provided by third party providers/systems on your performance on screening or selection tools such as (not exclusively) the Capptivate assessment or the Watson Glaser Critical Reasoning Test; and
 - 10.1.9 information about criminal convictions and offences committed by you.
- 10.2** For participants in our internships, vacation schemes and work experience placements, in addition to the above, we may also collect the following Personal Data about you:
- 10.2.1 next of kin and emergency contact information;
 - 10.2.2 start and end date of your placement;
 - 10.2.3 the location of your placements;
 - 10.2.4 information regarding your performance during your placement;
 - 10.2.5 CCTV footage and other information obtained through electronic means such as swipecard records;
 - 10.2.6 information about your use of our information and communication systems; and
 - 10.2.7 photographs of you.
- 10.3** Please note that the type of Personal Data collected, and how Linklaters will Process your Personal Data may vary from country to country. Schedule 2 sets out some of the country specific variations to this notice. However, this table will be amended and added to as the firm continues to implement new standards of data protection globally across the firm. If you have any questions in relation to this notice or the country specific variations which may apply to you, please email data.protection@linklaters.com.
- 10.4** In relation to your emergency contact and beneficiary details, please note that we will assume you have the permission to share such information with us.
- 10.5** We need some of the Personal Data set out at paragraph 9.1 and 9.2 above in order to conduct the recruitment and selection process. If you do not provide such Personal Data, we may not be able to continue with the recruitment process or offer you employment, engage your services or offer you an internship, vacation scheme or work placement.

11 Using your Personal Data

- 11.1** We process your information for the following purposes:
- 11.1.1 to make decisions about your recruitment and appointment;
 - 11.1.2 to check you are legally entitled to work in the jurisdiction in which you are employed to work;

- 11.1.3 to assess your qualifications for a particular job or task;
 - 11.1.4 to conduct data analytics studies to assess and better understand job application rates and the efficacy of our recruitment processes;
 - 11.1.5 to reimburse you for any expenses that we have agreed to meet;
 - 11.1.6 to consider and make any appropriate adjustments to our recruitment processes as a result of any disability you may have;
 - 11.1.7 to deal with any legal disputes, including any accidents at work;
 - 11.1.8 for insurance purposes;
 - 11.1.9 to carry out equal opportunities monitoring; and
 - 11.1.10 where your application is successful, to carry out our obligations arising from any contracts entered into with you and to administer your ongoing relationship with the firm.
- 11.2** Where you undertake an internship, vacation scheme or work experience placement with us, in addition to the above and to the extent permitted under applicable law,, we also process your information for the following purposes:
- 11.2.1 to make decisions about your placement with us;
 - 11.2.2 to determine any performance requirements;
 - 11.2.3 for business management, reporting and planning purposes;
 - 11.2.4 to comply with health and safety obligations;
 - 11.2.5 to prevent fraud;
 - 11.2.6 to monitor your use of our information and communication systems to ensure compliance with our IT policies;
 - 11.2.7 to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
 - 11.2.8 to conduct data analytics studies to assess and better understand the efficacy of our programmes and initiatives; and
 - 11.2.9 for education, training and development.
- 11.3** We do not take automated decisions about you using your Personal Data or use profiling in relation to you.

12 Using your Special Personal Data

- 12.1** Some information is classified as Special Personal Data. This information is more sensitive and we need to have further justifications for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data.
- 12.2** Please note that the type of Personal Data collected, and how Linklaters will Process your Personal Data may vary from country to country. Schedule 2 sets out some of the country specific variations to this notice. However, this table will be amended and added to as the

firm continues to implement new standards of data protection globally across the firm. If you have any questions in relation to this notice or the country specific variations which may apply to you, please email data.protection@linklaters.com.

12.3 However, as a firm, we may process special categories of personal information and criminal conviction information, to the extent permitted under applicable law, in the following circumstances:

12.3.1 With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

12.3.2 We will use information about your educational background, health (including any disability), gender, gender identity, race or ethnic origin, religious or philosophical beliefs, your sexual life or sexual orientation to ensure meaningful equal opportunity monitoring and reporting. More information about using your information for diversity monitoring can be found below at Section 13 of this notice.

12.3.3 Linklaters does not collect information on your membership to trade unions, except for membership of a professional body which also acts as a trade union for that specific profession, for example, The Law Society within the UK.

12.4 The type of Personal Data collected, and how Linklaters will Process your Personal Data may vary from country to country and this notice may be amended and added to as the firm continues to implement new standards of data protection, globally across the firm. If you have any questions on any country specific variations, please email data.protection@linklaters.com.

13 Using your diversity data

13.1 Please note that there may be variations in the diversity data that is collected and/or processed in each of Linklaters' offices and only data in relation to gender is collected globally. Please see Schedule 2 for more details of the variations which apply to each office. For more information, please email data.protection@linklaters.com.

13.2 Regarding your diversity data, one of our key objectives as a firm is to attract and retain the best people. We aim to do this in part by ensuring that our people are diverse, well trained and flexible, allowing us better to serve our clients. We can only know if we are achieving this objective if we collate and monitor information on the diversity of our people. In addition, we are also committed to helping to increase transparency on this issue across the legal profession. We collect the following Special Personal Data for diversity purposes:

13.2.1 Racial or ethnic origin: Linklaters collects this information in order to generate statistical data which Linklaters uses to demonstrate its diversity. When this information is used by Linklaters, none of these statistics will refer to Data Subjects as an individual or contain information from which an individual can be identified. Information about an individual's racial or ethnic origin will only be recorded if this is provided by the individual when requested by Linklaters through its diversity monitoring questionnaires. No further use of such data will be permitted without the individual's explicit consent.

13.2.2 Religious or philosophical beliefs: Linklaters collects this information in order to generate statistical data which Linklaters uses to demonstrate its diversity. When this information is used by Linklaters, none of these statistics will refer to Data Subjects as an individual or contain information from which an individual can be identified.

Information about an individual's religious beliefs will only be recorded if provided by an individual on request for the purpose of diversity monitoring. No further use of such data will be permitted without an individual's explicit consent.

13.2.3 Sexual lifestyles or sexual orientation: Linklaters collects this information in order to generate statistical data which Linklaters uses to demonstrate its diversity. When this information is used by Linklaters, none of these statistics will refer to Data Subjects as an individual or contain information from which an individual can be identified. Information about an individual's sexual lifestyle or sexual orientation will only be recorded if this is provided by the individual when requested by Linklaters through its diversity monitoring questionnaires. No further use of such data will be permitted without the individual's explicit consent.

13.3 Any response you provide in relation to diversity monitoring by the firm will be stored by the firm as part of your electronic recruitment record. We collect this information in order to generate statistical data which Linklaters uses to demonstrate its diversity. When this information is used by Linklaters, none of these statistics will refer to you as an individual or contain information from which an individual can be identified. Information about an individual's racial or ethnic origin will only be recorded if this is provided by you when requested through the relevant diversity questionnaire and for the purposes of diversity monitoring. No further use of such data will be permitted without your explicit consent. Access to the responses you provide will be restricted to those individuals who have a need to know the same.

13.4 We will share this data with our regulatory bodies, for example only, the Solicitors Regulatory Authority in the UK and as otherwise required by law, for example in order to comply with the Equality Act 2010 in the UK.

13.5 We rely on your consent to process your diversity data. Please note that you can withdraw consent to process this diversity data at any time. You can do this by selecting "Prefer not to say" in the Capptivate system or, to the extent that you are unable to do so, please email graduate.recruitment@linklaters.com.

14 Legal basis for using your Personal Data

14.1 Under the GDPR we are only permitted to use your Personal Data if we have a legal basis for doing so. We process the Personal Data listed in Section 9 of this notice on the basis that:

14.1.1 it is necessary in order to enter into a contract with you, including to enable us to determine whether to enter into any contract with you;

14.1.2 it is necessary to comply with a legal or regulatory obligation; and/or

14.1.3 it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

14.2 In more limited circumstances we may also rely on the following legal bases:

14.2.1 we need to protect your interests (or someone else's interests).

14.2.2 it is needed in the public interest.

- 14.3** Schedule 1 of this notice provides more detail about the categories of Personal Data that we use through the recruitment and selection process and the legal basis that we rely on in each case and your rights in this regard.

15 Updating your Personal Data

- 15.1** You have control over and direct access to your Personal Data in the Capptivate system and can update your Personal Data within the Capptivate system, as required, to ensure that your Personal Data is accurate and up to date. To the extent that you are unable to update your Personal Data within, please email graduate.recruitment@linklaters.com.

16 Sharing your Personal Data

- 16.1** Your Personal Data is subject to strict access controls and authorisation procedures when we share your Personal Data internally within the firm, to ensure that your Personal Data is only accessed by those who need access in order to carry out their role. These access controls are regularly reviewed to ensure that the access remains appropriate.
- 16.2** We may also share your Personal Data with third party suppliers who are involved in data hosting and other services necessary to carry out the purposes mentioned above, including for example, recruitment agents and IT systems providers. As part of the firm's standard sourcing policies, third party suppliers are subject to due diligence procedures, ongoing checks and audits, and appropriate contractual clauses to ensure that they have appropriate safeguards in place to protect your Personal Data and are handling your Personal Data in compliance with all relevant data protection laws and regulations. For more details about the measures we put in place when sharing your Personal Data please see our [Data Protection Standards](#) for more information.
- 16.3** Through your application journey, when you use the Capptivate system, if you provide answers to any of the optional Contextual Information questions, we will share this information with a third party called Rare Recruitment Limited who assist us with collating your responses in an anonymised and easy to use format. Further information about Rare Recruitment and how they will use your personal data is set out in their privacy notice <https://contextualrecruitment.co.uk/legal/privacy>. You may answer 'do not wish to disclose' if you do not want to provide these responses.
- 16.4** Your Personal Data may be accessed by third party suppliers and individuals within Linklaters that are located outside of the EEA. To ensure that your Personal Data is safeguarded, appropriate contractual clauses and mechanisms are in place with the relevant third-party suppliers located outside of the EEA, and the global [Data Protection Standards](#) ensure that your Personal Data is processed appropriately. For more information on the countries to which your Personal Data may be transferred, please see our [Data Protection Standards](#).

17 Securing your Personal Data

- 17.1** Linklaters takes its obligations to securely safeguard your Personal Data very seriously and implements appropriate technical and organisational precautions to protect Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access. Linklaters does this in a number of ways including by:

- 17.1.1** protecting personal information held in hardcopy or electronic form;

17.1.2 ensuring that information containing Personal Data, and in particular any sensitive Personal Data, will be handled appropriately; and

17.1.3 making sure that personal information is not transferred outside the EEA without suitable safeguards.

17.2 Linklaters has various policies in place to ensure the security of data. All individuals who have access to Linklaters' Personal Data must follow the guidelines set out in those policies to ensure the adequate protection of Personal Data. The **Data Protection Standards** are a set of firm wide binding privacy commitments that allow us to transfer Personal Data globally, within the firm's network, in full compliance with the law.

18 Retaining your Personal Data

18.1 We will only keep your data for so long as necessary for the purposes for which it was collected, in order for us to fulfil our statutory obligations and where we have a legitimate interest to do so. Full details of the retention periods that apply to your Personal Data are set out in our **Global Retention Policy**.

19 Your rights in relation to your Personal Data

19.1 You have a number of rights in relation to your Personal Data. These are as follows:

19.1.1 the right to be informed about how your Personal Data is used;

19.1.2 the right to access Personal Data;

19.1.3 the right to have inaccurate Personal Data rectified;

19.1.4 the right to have Personal Data erased in certain circumstances;

19.1.5 the right to restrict Processing of Personal Data in certain circumstances;

19.1.6 the right to data portability;

19.1.7 the right to object to Processing of Personal Data in certain circumstances, including where Personal Data is used for marketing purposes; and

19.1.8 the right to not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect.

19.2 Schedule 1 provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

20 How to make a complaint about the use of your Personal Data by us

If you have any concerns or would like to make a complaint about our processing of your Personal Data, please refer to our Global Data Protection Complaints Procedure, which is available on the privacy section of our website at <https://www.linklaters.com/en/legal-notices/privacy-portal>. You may raise your concerns with your local data protection authority directly, without going through our Global Data Protection Complaints Procedure. However, we would encourage you to contact us in the first instance as we aim to promptly, efficiently and satisfactorily resolve any concerns or complaints you may have in relation to Linklaters' processing of your Personal Data.

21 Your right to make a complaint to a supervisory authority

21.1 The spirit of the policy is to engage positively and to reach an understanding with the complainant without the need to escalate matters. However, if the concern cannot be resolved internally, a complainant:

21.1.1 can raise the matter with a data protection authority in a relevant jurisdiction; or

21.1.2 seek redress through local courts.

21.2 Linklaters has a Global Data Protection Complaints Procedure which is available to all Data Subjects. A copy of the Global Data Protection Complaints Procedure can be obtained [here](#).

Schedule 1

Legal Basis for processing your Personal Data

Please note that there may be variations with regards to the Personal Data processed in each of Linklaters' offices, for example, not all offices collect the information set out in this section. For more information regarding this, please email data.protection@linklaters.com.

During our recruitment processes

Purpose	Personal Data used	Legal basis	Which rights apply?*
Recruitment decisions	Personal contact details, national insurance number, recruitment information, employment/engagement records, and compensation history.	Contractual necessity and legitimate interests. It is in our legitimate interests to evaluate whether you have the necessary skills and qualities to perform the relevant role.	The generally applicable rights plus the right to object.
Right to work checks	Information relating to your right to work status, national insurance number, passport number, nationality, tax status information, and personal contact details.	Legal obligation and legitimate interest. It is in our interests to ensure that those who work for us have the right to work in the UK as well as to establish the statutory excuse to avoid liability for the civil penalty for employing someone without the right to undertake the work for which they are employed.	The generally applicable rights plus the right to object.
Fraud and crime prevention	Information about criminal convictions and offences committed by you. Identity verification information.	Legal obligation, public interest and legitimate interest. It is in our interests as well as the interest of our candidates/ employees/ workers/ contractors to ensure the prevention of fraud and crime is	The generally applicable rights plus the right to object.

		monitored. This will ensure a safe workplace for all.	
Diversity monitoring	Gender, marital status and dependents and information about your race or ethnicity, religious beliefs, health, sexual orientation.	Public interest.	The generally applicable rights plus the right to object.
To deal with legal disputes	Personal contact details, references, information submitted as part of the selection process and interview notes.	Legitimate interest. It is in our interests to process Personal Data to make and defend legal claims to ensure that our legal rights are protected.	The generally applicable rights plus the right to object.
Processing of expenses	Personal contact information, bank account details	Legitimate interest. It is in our interests and the interests of our applicants to ensure that any expenses properly incurred are reimbursed	The generally applicable rights plus the right to object.

*The following generally applicable rights always apply: right to be informed, right of access, right to rectification, right to erasure, right to restriction and rights in relation to automated decision making. For more detail about your rights and how to exercise them please see [Your rights in relation to your Personal Data](#)

During any internship, vacation scheme or work experience placement

Purpose	Personal Data used	Legal basis	Which rights apply?*
Management of your placement and the processing of expenses	Personal contact information, bank account details, start and end date of placement and date of birth, compensation / expenses records.	Legitimate interest. It is in our interests and the interests of our experience students to ensure that placements are properly managed and any expenses incurred are reimbursed.	The generally applicable rights plus the right to object.

Compliance with our statutory duties to ensure a safe place of work	Information about your health, including any medical condition, health and sickness records and location of placement.	Legal obligation.	The generally applicable rights only.
Management of sickness absence	Personal contact details, placement records (sickness hours/days) and information about your health.	Legitimate interest. It is in our interest to manage our business needs if our work experience students are going to be absent from their placement.	The generally applicable rights plus the right to data portability.
To monitor compliance with our policies	Personal contact details, information about your use of our information and communication systems, CCTV footage and other information obtained through electronic means such as swipecard records and performance information.	Contractual necessity and legitimate interest. It is in our interests to ensure our work experience students are complying with our policies to ensure our business can function effectively and because non-compliance with policies can result in termination of the placement, ultimately affecting our day to day operations and business plans.	The generally applicable rights plus the right to object.
Fraud and crime prevention	Information about criminal convictions and offences committed by you, personal contact details and CCTV footage and other information obtained through electronic means such as swipecard records.	Public interest and legitimate interest. It is in our interests as well as the interests of our work experience students to ensure the prevention of fraud and crime is monitored. This will ensure a safe workplace for all.	The generally applicable rights plus the right to object.
Diversity monitoring	Gender, marital status and dependents, location of placement and information about	Public interest.	The generally applicable rights plus the right to object.

	your race or ethnicity, religious belief and sexual orientation.		
To deal with legal disputes	Personal contact details, placement records, performance information, compensation / expenses records, photographs, CCTV footage and other information obtained through electronic means and information about criminal convictions and offences committed by you.	Legitimate interest. It is in our interests to process Personal Data to make and defend legal claims to ensure that our legal rights are protected.	The generally applicable rights plus the right to object.
Business management and business planning	Information about your use of our information and communication systems, placement records, location of placement and personal contact details.	Legitimate interests. It is in our interests to undertake this processing to ensure we can improve any business operations which will ultimately improve the overall quality of the placement. Work experience students will ultimately benefit as the workplace and its procedures may be strengthened.	The generally applicable rights plus the right to object.

*The following generally applicable rights always apply: right to be informed, right of access, right to rectification, right to erasure, right to restriction and rights in relation to automated decision making. For more detail about your rights and how to exercise them please see Section 16 [Your rights in relation to your Personal Data](#)

Schedule 2

Country Specific Variations

Country	Country specific variation	Section(s) impacted
Bangkok	The following applies to the Processing of Personal Data in Bangkok: Personal Data is not collected in accordance with 10.1.5 for applicants;	Section 10.1.5
Belgium	The following applies to the Processing of Personal Data in Belgium: Save in relation to sex/gender and nationality, Personal Data is not collected in accordance with 10.1.3.	Sections 10.1.3
France	The following applies to the Processing of Personal Data in France: - The Scope includes salaried and self-employed contracts; and - Save in relation to sex/gender and nationality, Personal Data is not collected in accordance with 10.1.3.	Sections 10.1.3
Germany	The following apply to the Processing of Personal Data in Germany: - Save in relation to gender, Personal Data is not collected in accordance with 10.1.3; - Personal Data in 10.1.5 is only collected where the applicant has requested a refund of their travel expenses incurred for the interview; - Personal Data is not collected in accordance with 10.1.6; - Personal Data in 10.1.7 is only collected if the applicant is successful, as part of the offer stage; - Personal Data is not collected in accordance with 10.1.8; - Personal Data is not collected in accordance with 10.1.9; and - Save for 10.2.7 on a voluntary basis, section 10.2 is not applicable in Germany.	Sections 10.1.3, 10.1.5, 10.1.6, 10.1.7, 10.1.8, 10.1.9 Section 10.2 Section 11.1.2
Italy	The following applies to the Processing of Personal Data in Italy: - Save in relation to gender, Personal Data is not collected in accordance with 10.1.3; - Personal Data is not collected in accordance with 10.1.5;	Sections 10.1.3, 10.1.5, 10.1.6, 10.1.9, 10.2.1, 10.2.4 and 10.2.5.

	• Personal Data is only collected in accordance with 10.1.6 in relation to <i>categorie protégée</i> applicants and this is limited to that data which such applicants are required to provide by law; • Personal Data is not collected in accordance with 10.1.9; • Personal Data is not collected in accordance 10.2.1; • Personal Data is not collected in accordance with 10.2.4; and • Personal Data is not collected in accordance with 10.2.5.	
Luxembourg	The following applies to the Processing of Personal Data in Luxembourg: • Personal Data is not collected in accordance with 10.1.8; and • Personal Data is not collected in accordance 10.2.1.	Sections 10.1.8 and 10.2.1.
The Netherlands	The following applies to the Processing of Personal Data in The Netherlands: • Personal Data is collected in accordance with 10.1.3, 12.3.2, 12.3.3 and 13 in relation to gender, nationality and marital status only; • Personal Data is not collected in accordance with 10.1.6; and • Personal Data is not collected in accordance with 10.2.5.	Sections 10.1.3, 10.1.6, 10.2.5, 12.3.2, 12.3.3 and 13.
Poland	The following applies to the Processing of Personal Data in Poland (Business services): • Personal Data in 10.1.2 in only collected if the applicant is successful, at the offer stage; • Save in relation to gender, nationality and health Personal Data is not collected in accordance with 10.1.3; • In 10.1.4 References are collected on a voluntary basis; • Personal Data in 10.1.5 in only collected if the applicant is successful, at the offer stage; • Personal Data is collected in accordance with 10.1.6 only for salaried contracts, not for interns; • Personal Data is not collected in accordance with 10.1.8; and • Personal Data is not collected in accordance with 10.1.9.	Section 10.1.3, 10.1.4, 10.1.5, 10.1.6, 10.1.8, 10.1.9, 10.4, 10.2.5 and 11.1.5.

	The following applies to the Processing of Personal Data in Poland (Practice): • Save in relation to gender, Personal Data is not collected in accordance with 10.1.3; Personal Data is not collected in accordance with 10.1.9; • Personal Data is not collected in accordance with 10.4; and • Personal Data is not used in accordance with 11.1.5.	
Portugal	The following applies to the Processing of Personal Data in Portugal: • Save in relation to gender, Personal Data is not collected in accordance with 10.1.3; • Personal Data is not collected in accordance with 10.1.9; • Personal Data is not collected in accordance with 10.2.5; and • In addition to the Personal Data collected in accordance with 10.1, photographs are also collected.	Sections 10.1, 10.1.3, 10.1.9, and 10.2.5.
Spain	The following applies to the Processing of Personal Data in Spain: • Save in relation to nationality, Personal Data is not collected in accordance with 10.1.3; • Personal Data is not collected in accordance with 10.1.6; • Personal Data is only collected for Spanish citizen for the purpose of 10.17; • Personal Data is not collected in accordance with 10.1.8; and • Personal Data is not collected in accordance with 10.1.9.	Sections 10.1.3, 10.1.6, 10.1.7, 10.1.8, 10.1.9
Sweden	The following applies to the Processing of Personal Data in Sweden: • Save in relation to gender, Personal Data is not collected in accordance with 10.1.3; • Personal Data is not collected in accordance with 10.1.5; • Personal Data is not collected in accordance with 10.1.6; • Personal Data is not collected in accordance with 10.1.9; and • Personal Data is not collected in accordance with 10.2.5.	Sections 10.1.3, 10.1.5, 10.1.6, 10.1.9 and 10.2.5.

Tokyo	The following applies to the Processing of Personal Data in Tokyo: • Personal Data is not collected in accordance with 10.1.5; • Personal Data is not collected in accordance with 10.1.8 for graduate hires; In addition to the data set out in section 10.2, the data listed below is collected for participants in our vacation schemes and work experience placements: • Social insurance information including Pension Number, My Number, Unemployment Number if one is applicable for payroll enrolment; • Resident Card Number (for foreigners).	Sections 10.1.5, 10.1.8 and a10.2
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