

About this Candidate Privacy Notice

Last updated: 13th February 2025

Turner & Townsend Limited is a company registered in England and Wales under company Number 6468643, our registered office is at Low Hall, Calverley Lane, Horsforth, Leeds LS18 4GH.

In this candidate Privacy Notice ("Notice"), we outline how we collect, use, and disclose personal information in connection with our recruitment and hiring efforts, as well as rights that job applicants may have with respect to such information. If you are a job applicant, we recommend you periodically review this Notice to ensure you are fully informed about your rights and our handling of your Personal Information.

We may be required by law to provide different or additional disclosures that are related to the processing of personal information of residents of certain regions (e.g., European Economic Areas).

Whenever this Notice refers to Turner & Townsend", "we", "us" or "our", it refers to the applicable responsible Turner & Townsend entity/ies. Our data collection and handling practices relating to personal information of employees, contractors, and similarly employed individuals are described in our Employee Privacy Notices which will be made available to you (as applicable) in case of a successful recruiting and onboarding process.

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any
 way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only for as long as is necessary for the purposes we have told you about; and
- Kept securely.

What information we collect about you?

This Notice only relates to personal information and not to any data we have collected that is aggregated, anonymous or any data that does not relate to an identified or identifiable natural person.

We collect personal information about you to support the recruitment and hiring process, and to comply with relevant legal requirements. Such information generally includes the following categories:

- Name and contact details (name, email, address, date of birth and telephone number);
- CV, application, experience, education, academic and professional qualifications, and areas of interest;
- Photographs and documents to verify your identity;
- Social media handles (LinkedIn, Facebook, X, etc.) that you chose to provide to us;
- Information and notes from interviews and assessments;
- Information about your employment eligibility to work in the region or the position to which you are applying to;
- Information about your current level of renumeration, including benefit entitlements;
- Information about any criminal convictions, offences, and information from credit checks following a receipt of an offer of employment;
- Health information;

- Diversity and equal opportunities data which would include more sensitive personal information such as gender, race, ethnicity, military veteran status and disability status (only where allowed by applicable law and if you choose to provide it); and
- Cookie information as you browse our Careers website. For more information on our Cookie Policy, including cookies used by us and how you can manage your cookie preferences see our Cookie Policy.

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.

We may also create personal information in the course of our recruitment activities with you, including:

- Interview recordings and results, including from video interviews and video assessments;
- Assessment results and feedback from online and face-to-face assessments/tests; and
- Employment offer details.

How is your personal information collected?

Often, personal information is obtained directly from you, the candidate. For example, in your application form or in the resume that you send to us.

We also collect personal information about you from third parties, including from the following sources:

- Service providers who assist us with Talent Acquisition activities, such as recruitment agents, evaluation service providers, and IT and data hosting providers. This includes third-party agencies and job boards who refer candidates for employment opportunities, background check providers for performing background checks of select job applicants, and telecommunication companies to perform video and audio interviews of job applicants (but only as allowed by applicable law). These third-party service providers are engaged on our behalf and act upon our instruction as data processors / service providers;
- Consultants and advisors who assist us with legal, regulatory, and business operations activities, such as legal counsel, compliance consultants and business auditors; and
- Named references, from whom we collect information relating to your suitability for employment at Turner & Townsend.

How will we use your personal information?

When you apply for a job with Turner & Townsend, your personal information will be processed by us during the recruitment process as stated above. Processing personal information from applicants allows Turner & Townsend to assess a candidate's suitability for employment and make decisions on job offers. This also includes complying with legal obligations, for example verifying work eligibility before employment starts.

For candidates based in particular regions (e.g., EEA, UK) when we use your personal information, we are required to have a legal basis for doing so. Here you'll find the various legal bases which we may rely on when processing your personal information as part of recruitment and hiring.

Purpose	Lawful basis
Processing your application including communicating with you about roles you	Necessary for the purposes of a contract
have applied for, assessing your application, inviting you to interview.	Legitimate Interests (to process applications effectively and efficiently)
Conducting assessment of your skills, qualifications, and suitability, including processing feedback.	Legitimate Interests (to ensure that you are suitable for the role)

Purpose	Lawful basis
Conducting background and reference	Legitimate Interests (to ensure that you are suitable
checks, where applicable.	for the role)
Making you an offer and inviting you to	Necessary for the purposes of a contract
undertake onboarding.	
	Legitimate Interests (to process applications effectively and efficiently)
Complying with legal or regulatory	Legal obligation
requirements.	
To make appropriate adjustments during	Legitimate interests (to ensure our application
the recruitment process we will use	process is fair)
information about your disability status.	Necessary for the purposes of a contract
To a chicago loss full Discourity Or To charica	
To achieve lawful Diversity & Inclusion	Legitimate Interests (to ensure that we have a
objectives, we may (where allowed by law), collect Diversity Data you choose	diverse business)
to provide as necessary to comply with	Consent
applicable employment law obligations,	Consent
for the overriding legitimate business	
interests of Turner & Townsend, and	
for reasons of substantial public	
interest (such as reviewing and	
monitoring equality of employment	
opportunity and treatment of job	
applicants) or based on your consent	
(if required by law).	

Automated decision making:

 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Who has access to your personal information?

Turner & Townsend may share your personal information set out above either:

- Within Turner & Townsend entities that are located around the world; and/or
- With third parties.

Data sharing with Turner & Townsend entities

Your personal information will be shared internally within Turner & Townsend for the purposes described in this Notice. Turner & Townsend is a global organization and the personal information we collect, or you provide may be shared and processed with Turner & Townsend entities as necessary for the purposes identified above.

In particular:

- When you apply for or express interest in seeking employment outside your home country, your personal information will be processed by a responsible Turner & Townsend entity that is located in a country other than your home country; and
- As part of the assessment of your job application, Turner & Townsend's structure may require that your personal data is transferred to other Turner & Townsend entities outside your home country where individuals involved in the decision-making process for your application are located (e.g., regional HR department, line manager, etc.).

Where legally permissible to process and transfer Diversity Data outside your home country, and if you provide it, your Diversity Data may be shared with other Turner & Townsend entities outside your home country for the purposes identified above. To the extent possible, we will share such data in an aggregated, anonymized format.



Data sharing with third parties

We will only share your personal information with the following third parties for the purposes of processing your application, if applicable:

- Applicant tracking software provider;
- Disclosure and background checking/verification organisation;
- · Credit checking organisation;
- Third parties performing selection assessments/tests; and
- Other companies in case of a merger, acquisition, or sale.

In addition, we use third-party service providers and vendors to support our recruitment and hiring process. Where relevant, we will share your personal information with third parties.

Third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. 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.

Transferring your personal information

In case of international data transfers, we will protect your personal information as required by all applicable data protection laws.

We will only transfer your personal information outside of the UK and EEA if that country has an adequate level of protection according to the EU or EU Commission or the UK Government. If this is specifically done on the basis of your consent when you provide your personal information or where we rely on a mechanism for protecting your personal information as provided for under GDPR. For example, we may rely on the standard contractual clauses published by the European Commission and similar measures under UK laws when we share your personal information within the different Turner & Townsend group entities.

How do we protect your personal information?

We have implemented several technical, physical and organisational measures to protect personal information from being accidentally lost, used or accessed in an unauthorized 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. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Our security measures are kept under periodic review and are regularly updated to reflect developments in technology and security and changes to our business.

How long do we retain your data?

We will only retain the personal information we collect about you for as long as necessary for the purpose for which that information was collected, or as otherwise legally required.

We retain your personal information so that we can demonstrate, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment process in a fair and transparent way. When we delete/remove your information, we will do so in a way that is secure and appropriate to the nature of the information subject to that deletion/removal.

Certain personal information of successful applicants who become employees will be transferred to our



personnel files for record-keeping purposes in accordance with our employee data retention policies.

What are your rights under applicable data protection laws?

Under data protection laws you have several rights in relation to the personal information that we hold about you which we set out below. These rights might not apply in every circumstance. You can exercise your rights by contacting us at any time using the details set out in the <u>Contact us</u> below. We will not usually charge you in relation to a request.

Please note that although we take your rights seriously; there may be some circumstances where we cannot comply with your request such as where complying with it would mean that we couldn't comply with our own legal or regulatory obligations. In these instances, we will let you know why we cannot comply with your request.

- 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;
- 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 these grounds. You also have the right to object where we are
 processing your personal information for direct marketing purposes;
- 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. You may have the right
 to receive your personal information which you have provided to us in a structured, commonly used
 and machine-readable format and you may have the right to transmit that personal information to
 another entity; and
- Make a complaint to the Data Protection Authorities. If you believe that we have breached data protection laws when using your personal information. Please note that lodging a complaint will not affect any other legal rights or remedies that you have.
 - European Union national Data Protection Authorities: <u>Our Members | European Data Protection</u> <u>Board</u>
 - The Information Commissioner's Office (ICO United Kingdom): <u>Information Commissioner's</u> <u>Office (ICO)</u>
 - If your Data Protection Authority is not listed, please <u>Contact us</u> using the below.

Updates to this Notice

This Notice was last updated on 13th February 2025. Historic versions can be obtained by contacting us.

From time to time, we may need to make changes to this Notice, for example, as the result of changes to law, technologies, or other developments. We encourage you to periodically review this page for the latest information on our privacy practices. All changes shall be effective from the date of publication unless otherwise provided.



Contact us

If you have any questions about this Notice or how we handle your personal information, please contact privacy@turntown.com.

ATTN: Privacy Turner and Townsend Limited Low Hall Calverley Lane / Low Hall Road Horsforth Leeds LS18 4GH UK