ANTHROPIC APPLICANTS AND TEAM MEMBERS PRIVACY NOTICE (UK)

1. INTRODUCTION

- 1.1 This privacy notice applies to you if you are based in the UK and you are:
 - (a) a current or former employee, intern, contractor, consultant or temporary or agency member of staff engaged by us ("**Team Members**"); and
 - (b) an applicant or prospective Team Member ("Applicants").
- 1.2 This privacy notice sets out how and why Anthropic processes data that identifies or is associated with you ("personal information"), and your rights in relation to that information.
- 1.3 This privacy notice is not part of any contract of employment or other contract between you and Anthropic.
- 1.4 It is important that you read and understand this notice. If you have any questions or require further information, please contact the Legal team using the contact details in paragraph 3 of this privacy notice.

2. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION

- 2.1 References to "Anthropic", "we", "our" or "us" in this privacy notice are to the Anthropic entity that engages you as a Team Member or that you engage with as an Applicant. This will be either Anthropic PBC or Anthropic Limited.
- 2.2 We are the controller of the personal information that we collect and use as set out in this privacy notice. This means that we determine and are responsible for how this personal information is used.
- 2.3 Anthropic also uses third-party employers of record and third-party employment agencies to enter into employment contracts with individuals in certain jurisdictions. If you are employed by a third-party employer of record, or engaged through a third-party employment agency, that employer of record or agency will also be the controller and responsible for how your personal information is used. You should ensure that you read and understand their privacy notice in addition to this notice, as the way they use your personal information may be different to how Anthropic does.

3. CONTACT POINT FOR DATA PROTECTION QUERIES

Please contact the Legal team at legal@anthropic.com if you have any questions, comments, concerns and requests regarding this notice.

4. PERSONAL INFORMATION WE COLLECT ABOUT APPLICANTS

Information you provide

4.1 We will collect the following categories of personal information about you in connection with your application for work with us, either from you directly or from the recruitment or employment agency or employer of record that refers your application to us. The types of personal information we collect will vary depending on the nature of the position and role you are applying for:

| Personal information | How we use this information | Legal basis for processing |
|--|--|--|
| Personal contact details, such as your name, phone number, address and e-mail address. | We use this information to open and maintain applicant records. | The processing is necessary for our legitimate interests, namely managing job applications for positions with Anthropic. |
| | We use this information to communicate with you as part of the recruitment process. | The processing is necessary for our legitimate interests, namely communicating with applicants and managing job applications for positions with Anthropic. |
| Job application information, such as position applied for, previous roles, job description, responsibilities | We use this information to process and assess your application, including assessing your suitability for a role. | The processing is necessary for our legitimate interests, namely assessing the suitability of candidates for roles at Anthropic. |
| and assignments, years of service, qualifications and experience, and other information contained in your CV. | We use this information to calculate proposed salary and assessing eligibility for certain benefits. | The processing is necessary for our legitimate interests, namely assessing and preparing job offers. |
| | We use this information to monitor and improve our application process. | The processing is necessary for our legitimate interests, namely reviewing and updating our applications process. |
| Nationality, citizenship and right to work information, such as country of birth, government identification documents (including passports and residency permits) and, | We use this information to determine your eligibility to work. | The processing is necessary for compliance with a legal obligation to which we are subject, namely the Immigration, Asylum and Nationality Act 2006. |
| where relevant, visa information. | We use this information to fulfill our obligations to relevant government authorities. | The processing is necessary for compliance with a legal obligation to which we are subject, namely the Immigration, Asylum and Nationality Act 2006. |
| Any other data provided by you in the course of the application process, including electronic communications with you in relation to the | We use this information to process and assess your application, including assessing your suitability for a role. | The processing is necessary for our legitimate interests, namely assessing the suitability of candidates for roles at Anthropic. |
| application process. | We use this information to respond to your enquiries and to monitor and improve our application process. | The processing is necessary for our legitimate interests, namely managing applications and improving the application process. |

4.2 When we collect your personal information, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we will not be able to process your application successfully.

Information contained in records that we create ourselves

4.3 As part of your application process, we will also create **Interview evaluation and appraisal information**, such as comments and notes made by interviewers or other employees in connection with your application:

| Personal information | How we use this information | Legal basis for processing |
|--|--|--|
| Interview evaluation and appraisal information, such as comments and notes made by interviewers or other employees in connection with your | We use this information to process and assess your application, including assessing your suitability for a role. | The processing is necessary for our legitimate interests, namely assessing the suitability of candidates for roles at Anthropic. |
| application | We use this information to calculate proposed salary and assessing eligibility for certain benefits. | The processing is necessary for our legitimate interests, namely assessing and preparing job offers. |

Pre-employment vetting

4.4 If we decide to offer you employment or engage you as a consultant, we may also collect the results of any pre-employment screening checks against public or government databases before we make a formal offer to you. Depending on the nature of your role, such pre-employment screening information will include one or more of the following:

| Personal information | How we use this information | Legal basis for processing |
|---|--|---|
| Employment history and professional qualification verification. We may contact your professional and academic referees to confirm the employment, professional and academic information that you have provided to us. You should ensure that you have any referees' consent to disclose information about you to us when you submit your application. | We use this information to process and assess your application, including assessing your suitability for a role. | The processing is necessary in order to take steps prior to entering into a contract with you. |
| Anti-financial crime compliance searches, such as searches against lists of sanctioned individuals and politically exposed persons. | We use this information to identify and manage our risk and exposure to bribery and corruption, money laundering, tax evasion | The processing is necessary for our legitimate interests, namely risk and reputational management and to comply with legal obligations regarding contracting with sanctioned individuals. |
| | facilitation and negative publicity, as well as complying with UK and US government restrictions on | |

| | | contracting with sanctioned individuals. | |
|------------------------|---------|---|---|
| Basic criminal checks. | records | Where relevant for your role, and where permitted under applicable law, we use this information to identify potential risk of unlawful behaviour. | Where permitted under local law, the processing is necessary for our legitimate interests, namely identifying and mitigating the risk of unlawful behaviour in certain roles at Anthropic. In such cases, the additional condition relied on for processing this information is that processing is necessary for reasons of substantial public interest, namely preventing or detecting unlawful acts. |

4.5 We will inform you if we obtain any information through pre-employment screening that could affect our decision to offer you employment or appointment as a consultant. We will give you the opportunity to respond to the information obtained and will take your response into account when deciding whether to proceed with your appointment.

5. PERSONAL INFORMATION WE COLLECT ABOUT EMPLOYEES

Personal information collected as part of your application

5.1 If your application is successful and you become an employee, consultant or contractor of Anthropic, or are engaged as temporary or agency staff by Anthropic, the personal information we collect during the application process may be transferred to your personnel file and stored and used for purposes connected with your employment or engagement by Anthropic as follows:

| Personal information | How we use this information | Legal basis for processing |
|---|---|--|
| Identity and contact details, such as your name, title, gender, phone number, address, e-mail address, date of birth and photograph. | We use this information to open and maintain human resources records. | The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records. |
| | We use this information to communicate with Team Members for internal business purposes or emergencies. | The processing is necessary for our legitimate interests, namely communicating with Team Members. |
| | We use this information to issue payslips and process payroll. | The processing is necessary for the performance of a contract and to take steps prior to entering into a contract. |

| We use this information to | The |
|----------------------------|-------|
| grant you access to our | for o |
| premises and/or internal | nam |
| computer systems. | |

The processing is necessary or our legitimate interests, namely providing Team

| | We use this information to | Members access to company resources. The processing is necessary |
|---|--|--|
| | maintain an internal directory of Team Members. | for our legitimate interests, namely facilitating communication and collaboration between our Team Members. |
| | We use this information in our promotional material, such as websites, blogs and social media pages. | The processing is necessary for our legitimate interests, namely promoting and marketing our business. |
| Nationality, citizenship and right to work information, such as country of birth, government identification documents (including passports and residency permits), national | We use this information to determine your ongoing eligibility to work. | The processing is necessary for compliance with a legal obligation to which we are subject, namely the Immigration, Asylum and Nationality Act 2006. |
| insurance number or social security number and, where relevant, visa information. | We use this information to fulfil our obligations to relevant government authorities. | The processing is necessary for compliance with a legal obligation to which we are subject, namely the Immigration, Asylum and Nationality Act 2006. |
| Job application information, such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience, and other | We use this information to make ongoing salary decisions and decisions relating to eligibility for certain benefits. | The processing is necessary for the performance of a contract and in order to take steps prior to entering into a contract with you (including as you progress through job roles). |
| information contained in your CV and application form. | We use this information to fulfil obligations to regulators and professional bodies (e.g. demonstrating employee suitability). | The processing is necessary for our legitimate interests, namely to demonstrate and ensure our compliance with regulatory requirements to which we are subject or comply with. |
| | We use this information to monitor and allocate human resources. | The processing is necessary for our legitimate interests, namely managing our human resources. |

| Qualifications and experience, including your academic qualifications, your past work experience, and the roles you have held before working at Anthropic. | We use this information to assess your suitability for certain tasks, and to assess suitability for, and to process promotions, job moves and staff restructuring. | The processing is necessary for our legitimate interests, namely managing our resources. |
|--|--|--|
| Recruitment information, such as comments and notes made by interviewers or other Team Members in | We use this information to monitor and allocate human resources. | The processing is necessary for our legitimate interests, namely managing our human resources. |

| connection with your application. | We use this information to assess your suitability for certain tasks, and to assess suitability for, and to process promotions, job moves and staff restructuring. | The processing is necessary for our legitimate interests, namely managing our human resources and coordinating our business needs. |
|--|--|---|
| Results of reference checks, such as verification of education and employment history. | We use this information to assess your suitability for certain tasks, and to assess suitability for, and to process promotions, job moves and staff restructuring. | The processing is necessary for our legitimate interests, namely managing our resources. |
| Results of background checks, namely whether you passed any background checks conducted during the application process, including criminal records checks and anti-financial crime checks. | We use this information to verify your suitability for certain tasks and suitability for a role, where the nature of the role requires additional background checks. | The processing is necessary for our legitimate interests, namely risk and reputational management. Criminal offence data is processed only where permitted under local law, and the processing is necessary for our legitimate interests, namely identifying and mitigating the risk of unlawful behaviour in certain roles at Anthropic. In such cases, the additional condition relied on for processing this information is that processing is necessary for reasons of substantial public interest, namely preventing or detecting unlawful acts. |

Personal information collected directly from you when you become a Team Member

We will also collect the following additional information about you either from you directly or from a third-party employer of record or employment agency in the course of your employment or engagement. When we collect personal information from you, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we may be unable to perform some of our obligations to you or provide you with certain benefits.

| Personal information | How we use this information | Legal basis for processing |
|--|--|---|
| Payment information, such as your credit card or bank account details and billing address. | We use this information to pay salaries and other benefits to Team Members. | The processing is necessary for the performance of a contract. |
| | We use this information to process expenses claims. | The processing is necessary for the performance of a contract. |
| Information collected in employee surveys and exit interviews. | We use this information to monitor, assess and improve our employee development and company culture. | The processing is necessary for our legitimate interests, namely informing our employee and business development. |

Records containing personal information maintained by us

5.3 We will also create and maintain records relating to your employment or engagement with us as follows as part of our ongoing relationship with you:

| Personal information | How we use this information | Legal basis for processing |
|--|--|---|
| Current job role information, such as position held, location of role, job description, responsibilities and assignments, years of service, and previous roles at Anthropic. | We use this information to maintain human resources records. | The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records. |
| | We use this information to allocate resources. | The processing is necessary for our legitimate interests, namely managing and coordinating our human resources and maintaining company records. |
| | We use this information to assess, forecast and make business decisions about our human resources. | The processing is necessary for our legitimate interests, namely managing our resources and informing our marketing and business development. |
| | We use this information to determine the tasks and responsibilities assigned to you. | The processing is necessary for the performance of a contract. |
| | We use this information to maintain an internal directory of Team Members. | The processing is necessary for our legitimate interests, namely facilitating communication and collaboration between our Team Members. |
| | We use this information in our promotional material, such as websites, blogs and social media pages. | The processing is necessary for our legitimate interests, namely promoting and marketing our business. |
| Benefits information, such as salary details, bonus payments, pension details, share option details, medical and dental insurance, and any salary sacrifice benefits. | We use this information to maintain human resources records. | The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records. |
| | We use this information to provide and administer benefits for which you are eligible. | The processing is necessary for the performance of a contract. |

We use this information to assess, forecast and make business decisions in relation to financial and other obligations to Team Members and third parties (such as tax authorities and beneficiaries) in relation to

The processing is necessary for our legitimate interests, namely managing our resources and our obligations to Team Members and third parties.

| Personal information | How we use this information | Legal basis for processing |
|---|---|--|
| | any benefits owed to Team Members. | |
| | We use this information to report to tax authorities. | The processing is necessary for compliance with a legal obligation to which we are subject. |
| | We use this information to process payroll. | The processing is necessary for the performance of a contract. |
| Performance and development records, such as training records, records of courses and training undertaken, performance reviews and assessments. | We use this information to conduct performance appraisals and to assist with career planning and skills monitoring. | The processing is necessary for our legitimate interests, namely managing our human resources and fulfilling our professional and contractual obligations to third parties. |
| | We use this information to assess suitability for, and to process promotions, job moves and staff restructuring. | The processing is necessary for our legitimate interests, namely managing our human resources and monitoring the qualifications and experience of our staff. |
| | We use this information to provide references for future applications. | The processing is necessary for your legitimate interests, namely in connection with your application to a new position. |
| | We use this information to fulfil regulatory obligations, e.g. demonstrating compliance with regulatory and professional requirements in relation to compliance, training and qualifications. | The processing is necessary for our legitimate interests, namely to demonstrate and ensure our compliance with regulatory requirements to which we are subject or comply with. |

| Disciplinary, capability and conduct records, such as details of warnings, details of grievances submitted by and in relation to the individual and other | We use this information to assess and take action in relation to disciplinary, capability, grievance and conduct issues. | The processing is necessary for the performance of a contract. |
|--|---|--|
| records relating to conduct. | We use this information to maintain employment records, monitor and improve our human resources procedures and processes. | The processing is necessary for our legitimate interests, namely managing our human resources, and ensuring compliance with internal policies and procedures, and risk management. |

| Personal information | How we use this information | Legal basis for processing |
|--|--|---|
| | We use this information to comply with legal obligations to which we may be subject. | The processing is necessary to comply with a legal obligation to which we are subject, such as workplace bullying and harassment and anti-discrimination legislation in the UK. |
| Absence records, such leave requests and approvals, and dates and time away from the office on leave. | We use this information to make corresponding decisions relating to human resource allocation, and to address any other issues that may arise from absences. | The processing is necessary for our legitimate interests, namely managing our human resources and ensuring compliance with internal policies and procedures. |
| Health and safety records, including information relating to health and safety in the work place, accidents and near misses. | We use this information to address legal obligations to Team Members in relation to health and safety in the work place. | The processing is necessary for carrying out obligations and exercising specific rights in the field of employment insofar as it is authorised by UK, EU or Member State law. |

Information about IT use and physical access to premises

5.4 To ensure the security of our premises and our IT systems, we collect the following information automatically about your access and use of our premises, IT systems and IT equipment.

| Personal information | How we use this information | Legal basis for processing |
|----------------------|-----------------------------|----------------------------|
| | | |

| Access logs and CCTV. We may directly collect CCTV recordings at our premises or collect such recordings from the security providers at our premises. | We use this information to monitor access to our premises for security purposes. | The processing is necessary for our legitimate interests, namely ensuring the safety and security of Team Members and property. |
|--|--|--|
| Any other data provided by the Employee that is stored on employer's equipment and computer systems, including electronic communications, information relating to use of the computer systems, documents stored on company hardware. | We use this information to investigate security breaches and misuse of computer equipment and systems, and to maintain and back-up records in accordance with back-up and disaster recovery plans. | The processing is necessary for our legitimate interests, namely providing internal computer systems and hardware, and ensuring the security and integrity of those systems. |
| Data collected through monitoring of Employee communications and use of employer equipment, such as registration and login times and dates, | We use this information to identify and investigate security breaches and misuse of computer equipment and systems. | The processing is necessary for our legitimate interests, namely providing internal computer systems and hardware, and ensuring the |
| internet domain names visited using Anthropic IT equipment, software used, account status and other equipment use metrics. | | security and integrity of those systems. |

Personal information we collect about persons connected to you

At times, we may collect and process the following personal information about your family members, dependants, beneficiaries, and other people related or connected to you ("Related Persons") in connection with administering emergency contacts and other benefits and services (including governmental tax and social benefits) to which your Related Persons may be entitled. We may collect this information from you or through service providers and other third parties that collect it on our behalf. When you provide information about these Related Persons to us, you should ensure that you give them a copy of this privacy notice.

| Personal information | How we use this information | Legal basis for processing |
|---|--|--|
| Details of partners, dependants, beneficiaries. | We use this information to process benefits (including governmental tax and social benefits) to which Team Members' partners, dependants or other beneficiaries may be entitled. | The processing is necessary for the performance of a contract. |

| Next of kin | We use this information to contact the designated contacts in the case of an emergency or as in-death-beneficiaries. | The processing is necessary for our legitimate interests, namely engaging with family members and next of kin in the event of an emergency that affects a Team Member. |
|-------------|--|--|
|-------------|--|--|

5.6 We may also use the personal information we collect for external purposes, such as promoting our business or compliance with law enforcement. This processing is usually necessary for our legitimate interests, the legitimate interests of external agencies and for compliance with our legal obligations.

6. SENSITIVE PERSONAL INFORMATION

6.1 In limited circumstances, we may need to process the following special categories of personal information ("sensitive information") about you for specific purposes:

| Personal information | How we use this information | Legal basis for processing |
|---|---|---|
| Disability and health records, such as information relating to any disability or health condition that is relevant to an individual's job role. | We use this information to address legal obligations to Team Members, including making reasonable adjustments to enable or assist Team Members to perform their role. | The processing is necessary to comply with applicable law relating to equality and non-discrimination, and for carrying out the obligations and exercising specific rights in the field of employment |

| | | insofar as it is authorized by UK law. |
|--|---|--|
| Records of absences due to medical or family reasons, such as illnesses and paternity/maternity leave. | We use this information to meet statutory requirements with regards to illnesses, accidents and absences. | The processing is necessary to comply with applicable law relating to workplace health and safety, and for carrying out obligations and exercising specific rights in the field of employment insofar as it is authorised by UK law. |

7. CONSENT

- 7.1 We are not required to obtain your consent for most of the processing activities that we undertake in respect of your personal information.
- 7.2 We may, however, need your consent in limited circumstances for some uses of certain personal information. For instance, in certain circumstances, we may need your consent to use certain sensitive information, such as information about your health or ethnicity, in particular ways.

- 7.3 If we need your consent, we will notify you separately of the personal information we intend to use and how we intend to use it.
- 7.4 You will never be obliged to give us this consent. Where you have given us consent to collect, use or disclose your personal information in a certain way, you may withdraw your consent at any time. If you wish to withdraw any consent that you have given us, please contact the Legal team using the contact details in paragraph 3 of this privacy notice.

8. KEEPING YOUR INFORMATION UP TO DATE

As your circumstances change, please inform us of any changes to your personal information so that we can ensure that the personal information we store about you is accurate and up to date.

9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

9.1 Unless a longer retention period is required or permitted by law, we will only hold your personal information for the following periods:

| Personal information | How long we keep it |
|---|---|
| Information you provide as an applicant or that we generate about you ourselves in connection with your application, as set out in paragraphs 4.1 and 4.3 | If your application is unsuccessful, or if you withdrew your application, we will keep this information for 12 months from the date you or we informed the other of their decision not to proceed with your application. |
| Information collected through pre-employment vetting, as set out in paragraph 4.4. | We will generally only retain the results of the pre- employment vetting we have carried out (i.e. whether you have passed the relevant checks). If your application is unsuccessful, or if you withdrew your application, we will keep this information for 12 months from the date you or we |

| | informed the other of their decision not to proceed with your application. |
|------------------------------|--|
| | If your application is successful, we will keep this information for the duration of your employment or engagement to the extent it is relevant to your ongoing employment or engagement with us. |
| | If we obtain any information through pre-employment screening that could affect our decision to offer you employment or appointment as a consultant, we will retain this information (together with any representations you make to us) until we make a decision as to whether to proceed with offering you a position at Anthropic. |
| Payroll and salary records | For the duration of your employment or engagement with Anthropic, and for 7 years after this employment or engagement ends. |
| Pension contribution records | For the duration of your employment or engagement with Anthropic, and for 7 years after this employment or engagement ends. |
| Records of other benefits | For the duration of your employment or engagement with Anthropic, and for 6 years after this employment or engagement ends. |

| Records relating to accidents, death or injury in connection with work | 6 years from the date of the report or termination of your employment or engagement (whichever is later). |
|---|---|
| Information about your nationality and right to work | For the duration of your employment or engagement with Anthropic, and for 2 years after this employment or engagement ends. |
| Maternity, paternity, shared parental leave and other family leave records | 3 years after the end of the tax year in which the maternity, paternity, shared parental leave or other family leave period ends. |
| CCTV records | 6 months |
| Information about your use of our IT systems | For the duration of your employment or engagement with Anthropic |
| All other information and records relating to your employment or engagement by us | For the duration of your employment or engagement with Anthropic, and for 6 years after this employment or engagement ends. |

10. RECIPIENTS OF PERSONAL INFORMATION

10.1 We may share your personal information with the following:

| Recipient | How they use it |
|--|--|
| Service providers: we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing mailing or email services, data hosting and record keeping services, and payments processing. Such information may be disclosed: | These recipients will use your personal information as processors only on our instructions. They may also aggregate and anonymise information to monitor the performance of, identify errors in, and improve their services. The lawful basis relied on for such transfers is that the processing is necessary for the relevant service provider's legitimate interests, namely to maintain and improve their services. |

| to providers of human resources management software and business collaboration tools; | |
|--|---|
| providers of our IT infrastructure and storage; | |
| providers of processing of salary and benefits payments. | |
| Advisors: we may share your personal information with our advisors in connection with obtaining professional services such as legal, financial and accountancy services on behalf of | These recipients will use your personal information in order to provide us with legal or financial, accountancy or tax advice. The lawful basis we rely on for such transfers is |
| Anthropic. | that the processing is necessary for our legitimate interests, namely obtaining professional services and advice. |

Employers of record and agencies: These recipients will use your personal If you are employed by a third-party information in accordance with the privacy employer of record, or engaged notices they have provided to you. through a third-party employment agency, we may share your personal The lawful basis we rely on for such transfers is data with them for the purposes of that the processing is necessary for our and the relevant third-party agency's legitimate interests. administering your employment. namely managing our contractual relationship and our respective relationships with you. Purchasers and third parties in These recipients will use your personal connection with a business information to assess the potential transaction transaction: your personal information with us. They may also use your personal may be disclosed to third parties in information to facilitate the integration of our Team connection with a transaction, such as Members into their structure in the event of an a merger, sale of assets or shares, acquisition. reorganisation, financing, change of control or acquisition of all or a portion The lawful basis we rely on for such transfers is of our business. that the processing is necessary for our and the third party's legitimate interests, namely assessing and executing a potential transaction with us. Third parties at your request: we These recipients will use your personal may disclose your personal information as disclosed in their privacy notice. information where you ask us to, such as banks or mortgage providers, We will only share your personal information in insurance and other benefit providers, this way to the extent you give us your consent to or other employers if you ask us for a do so. reference from us when you apply for another position. Third parties, as necessary in These recipients will use your personal connection with your job role: we information to communicate with you in may disclose certain personal connection with our relationship or prospective information, such as your name and relationship with them. contact details, to third parties who may need to contact you in connection The lawful basis we rely on for such transfers is with your role at Anthropic. that the processing is necessary for our and the third party's legitimate interests, namely managing our contractual or other relationship or prospective relationship.

for legal reasons: we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with law and/or reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or safety of Anthropic, our Team Members or others.

Law enforcement, government

bodies, regulators and other parties

or law enforcement role, or to advise us in connection with a potential claim or regulatory enforcement action.

information in the performance of their regulatory

These recipients will use your personal

The lawful basis we rely on for sharing personal information with these recipients is that the processing is either necessary to comply with a legal obligation to which we are subject or is necessary for our legitimate interests, namely enforcing our rights or complying with requests from regulatory authorities.

11. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

- 11.1 Security. We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on secure severs. Where we transfer personal information to our service providers, we will ensure that the recipients also implement appropriate technical and organisational security measures to protect your personal information.
- 11.2 **International Transfers of your Personal Information**. The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third-party service providers have operations. We will ensure that these international transfers of your personal information are made pursuant to appropriate safeguards, such as:
 - (a) ensuring that the personal information is only transferred to countries recognised as offering an equivalent level of protection as compared to the level of protection in the country you are located ("Adequacy"); or
 - (b) the transfer is made pursuant to agreements incorporating standard data protection clauses adopted by the European Commission and approved under the UK Data Protection Act 2018 ("SCCs").
- 11.3 Your personal information may be processed by recipients in the following countries:

| Destination country | Safeguard used |
|---------------------|----------------|
| USA | SCCs |
| | |

11.4 If you wish to enquire further about the safeguards we use, including obtaining a copy of any SCCs that we have entered into, please contact the Legal team using the contact details in paragraph 3 of this privacy notice.

12. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

- 12.1 In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:
 - (a) **Right of access**. You have the right to obtain:
 - (i) confirmation of whether, and where, we are processing your personal information;
 - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;

- (iii) information about the categories of recipients with whom we may share your personal information; and
- (iv) a copy of the personal information we hold about you.
- (b) **Right of portability**. You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
- (c) **Right to rectification**. You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure**. You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction**. You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- 12.2 Right to object. You also have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.
- 12.3 If you wish to exercise one of these rights, please contact the Anthropic Legal Team, using the contact details at the end of this privacy notice.
- 12.4 We will not charge you a fee for complying with your request to exercise one of these rights, other than where the request is manifestly unfounded or excessive (such as if you submit a number of repeated requests), in which case we may charge you a reasonable fee to cover our administrative costs.
- 12.5 You also have the **right to lodge a complaint** to the Information Commissioner's Office please see https://ico.org.uk/make-a-complaint/ for more information.

13. CHANGES TO THIS NOTICE

- 13.1 We may update this notice from time to time. When we change this notice in a material way, we will update the "last modified" date below. Please visit our internal Notion wiki for an up-to-date version of this notice.
- 13.2 This notice was last modified on 22 January 2024.