

JOB APPLICANTS AND TEAM MEMBERS

When you apply for a job at the Company, or in the course of your employment with the Company, we may request and process personal data from you. This may include information about you as well as your dependents, beneficiaries, or others whose personal data you provide to us. In addition to the applicable portions of our Privacy Statement above, the following applies specifically to applicants and team members at the Company.

Types of Personal Data We May Collect. The types of personal data we collect about you may include:

- Identification information – such as your name, gender, photograph or date of birth.
- Contact information – such as your address, telephone number, email address or emergency contact(s).
- Background information – such as your education, employment background (position/experience/responsibilities), professional qualifications, resumé, references or criminal records data (for vetting purposes, where permissible and in accordance with applicable law).
- Information on your spouse/partners/dependents – such as your marital status and/or identification and contact information for each person listed.
- Financial information – such as bank details, tax information, salary, benefits, expenses, allowances, stock and equity grants.
- IT information – such as technical information from you about your visit to our website (including “cookies” and other similar technologies) or information required to provide access to our Company systems and networks.
- Additional information that we have not specifically requested but that you share with us in your application or resumé, such as hobbies or interests.

If this information is not provided, our ability to consider you as a candidate may be limited.

On occasion, we may also process sensitive personal data relating to you (and your spouse/partner and/or dependents). Sensitive personal data includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, sexual orientation, trade union membership, criminal convictions, genetic data, biometric data for the purposes of unique identification and information about your health. In the United States, sensitive personal data also includes government identifiers (including social security number, driver's license, state identification card, or passport number), citizenship or immigration status, and precise geolocation data. As a general rule, we try not to collect or process any sensitive personal data about you, unless authorized by law or where necessary to comply with applicable laws or to provide benefits. We do not sell sensitive personal data collected under this Notice. However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some sensitive personal data for legitimate employment/work-related purposes: For example, we may ask for optional information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities (on the basis that it is in the

public interest and in accordance with applicable law), monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to provide work-related accommodations, health and insurance benefits to you and your dependents, or to manage absences from work.

Usually the personal data we hold about you has been provided by you. However, from time to time, we may obtain information about you from public sources or third parties. For example, we may conduct background screenings through a third-party service provider and verify information that you have in your application that relates to your past education, employment, credit and/or criminal history, as allowed by applicable law. You may also choose to provide us with access to certain personal information stored by third parties such as job-related social media sites (*e.g.*, LinkedIn). You understand and acknowledge that the Company may collect, store and use this information in accordance with this Privacy Statement.

How We Use Your Personal Data. The Company will use your personal information for the following purposes:

1. *Recruitment purposes.* Recruitment, selection, evaluation and hiring of job candidates.
2. *Employment/work purposes.* General human resources administration (if you become a Company team member).
3. *Communication purposes.* Communicate with you and to inform you of current status of your application and future opportunities (unless you have told us that you do not want us to keep your information for such purposes).
4. *Other legitimate business purposes.*
 1. to foster diversity, inclusion, and a welcoming work culture.
 2. to help us conduct our business more effectively and efficiently – for example, for general HR resourcing, reporting or analytics, IT security/management, business continuity purposes, accounting purposes, or financial planning.
 3. to help secure our networks and systems from unauthorized access, scams, and malicious code. For instance, we may monitor and review electronic mail communications sent or received using Company-issued devices or accounts, or stored on or using such a device or account.
 4. in accordance with any policies pertaining to the use of personal devices for work purposes (if you become a Company team member).

To Whom We Disclose Your Personal Data. We take care to allow access to personal data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate business purpose or other lawful ground for accessing it. We do not sell personal data we collect from and about you. We may disclose your personal information to the following:

1. *Other related companies.* Your personal data may be disclosed for the purposes described above with other companies within the Company portfolio, including affiliate

companies under common control with the Company, and with Davidson, and other properties managed by Davidson or its affiliates or subsidiaries. In the case of owners of other properties managed Davidson, the information disclosed would be limited in scope to the extent required for general employment/work purposes.

2. *Third party service providers.* We may also disclose your personal data to third parties who provide services to us such as recruitment agencies, consultants, background services providers, benefits providers and attorneys. We do so on a "need to know basis" and in accordance with applicable data privacy laws.

3. *Other third parties.* We may also disclose your personal data to other third parties (a) to comply with our legal obligations, including in order to respond to a lawful government request, court order, administrative or judicial process (such as a subpoena or search warrant); (b) as necessary to establish, exercise or defend against potential, threatened or actual legal claims; (c) where necessary to protect your vital interests or those of another person; or (d) where you have provided your consent.

European Job Applicants/Team Members and International Data Transfers (for Europe only).

If you are a job applicant or staff member in the United Kingdom, European Economic Area, or Switzerland (collectively, "**Europe**"), our legal basis for collecting and using the personal data described above will depend on the type(s) of personal data involved and the context in which such personal data was collected.

Generally, we will only collect personal data from you when:

- we need the personal data to perform a contract with you (e.g., for employment);
- we need to comply with applicable laws and regulations (e.g., employment or immigration laws);
- it is in our legitimate interests (without affecting your rights and taking into account safeguards we put in place);
- we have your consent to do so (which you may withdraw at any time); and/or
- we need to protect the rights and interests of the Company, our team members, applicants and others, as required and as permitted by applicable law.

Generally, and less often, we may collect sensitive personal data from you. We only do so when:

- you have given your explicit consent by voluntarily providing it;
- we need to comply with applicable laws and regulations;
- we need to make employment/work decisions about you;
- we need to establish, exercise or defend legal claims; and/or
- doing so is essential for reasons of substantial public interest in accordance with relevant law.

At all times, you have the option whether to provide personal data (sensitive or otherwise) to us. However, when we are requesting such information, we are doing in order to facilitate your employment/work relationship or to comply with our legal obligations. If you choose not to

provide personal data we request, it may prevent us from processing your application or continuing your employment/work and/or employment benefits (if applicable).

We process your personal data in the country in which it is collected. As we operate internationally, we may need to transfer personal data to countries other than the ones in which the information was originally collected. Our recruitment is currently hosted in the United States; in the future, we may host recruitment for European applicants (only) in the United Kingdom. When we export your personal data to a different country, we will take steps to ensure that such data export complies with applicable laws. In order to provide adequate protection of your personal information, we have in place contractual arrangements and/or policies (where appropriate) with other companies within the Company portfolio which cover these transfers, and we will take all reasonable measures to safeguard your information whenever it is transferred. For example, if we transfer personal data from Europe to a country outside of Europe, such as the United States, we will implement an appropriate data export solution such as entering into standard contractual clauses with the data importer, or taking other measures to provide an adequate level of data protection under European law. In each instance, however, we will maintain appropriate safeguards to require that your personal data will remain protected in accordance with this Privacy Statement.

How Long We Keep Your Personal Data. Personal data will be stored in accordance with applicable laws and kept as long as the Company has an ongoing legitimate business need to carry out the purposes described in this Privacy Statement or as otherwise required by applicable law. Generally, we will retain your personal data until the end of your application process, employment, or work relationship and then for a reasonable period of time thereafter to comply with regulatory obligations, legal or matters, benefits obligations or to respond to employment-related inquiries.

HOW TO CONTACT US

If you have any specific questions, please see our [Privacy Statement](#) for additional information, including how to contact us.