



## Applicant Privacy Policy

Bristan Group Ltd. values your trust and are committed to the responsible management, use and protection of personal information. This Applicant Privacy Policy (“Policy”) describes our practices in connection with personal information that we collect, use and share when you apply for a role at Bristan in the EU or UK.

This Policy does not apply when you are a consumer of Bristan products or when you are visiting Bristan’s websites. Please see our general online Privacy Policy to find out more about how we use personal information in those contexts.

### What is personal information?

In the course of reviewing your application for a role at Bristan Group, we collect information about you that you provide to us or that we obtain from third parties. We refer to such information as “personal information.”

### Personal information you provide

We collect personal information from you in connection with your application:

- a) Name, address, telephone number, e-mail address, and other contact information;
- b) Work authorisation status;
- c) CV, cover letter, previous work experience and education information;
- d) Skills;
- e) Professional and other work-related licenses, permits and certifications held;
- f) Information relating to references; and
- g) Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships).

Any information you provide to us when applying for a job must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment if you are employed. In addition, it is your responsibility to ensure that information you submit does not violate any third party’s rights.

If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

As discussed in the “Diversity” section below, in certain cases we will ask questions about race/ethnic origin, gender, and disability of our applicants, for equal opportunity monitoring (for HR use only). We can also inquire about criminal records. We will do so only where permitted by applicable law. Otherwise, we ask that you avoid submitting information that may qualify as sensitive personal information under applicable law, except where such information is legally required. Sensitive personal information includes race, religion, ethnicity, nationality or national origin, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status and vaccine information), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership.

### Information from other sources

We also collect personal information from other sources in connection with your application as permitted by applicable law, such as when we obtain information from your references, educational institutions you have attended and your prior employers.

### Use of information

Your personal information will be used for Bristan's recruitment, management and planning purposes, as permitted by applicable law. Specifically, we will process your personal information for the following purposes:

- **To process your application.** We will engage in these activities based on our legitimate interests and/or where necessary to take steps at your request prior to entering an employment contract;
- **To assess your capabilities and qualifications for a job.** We will engage in these activities to comply with a legal obligation and/or based on our legitimate interests;
- **To conduct reference checks.** We will engage in these activities to comply with a legal obligation, based on our legitimate interests and/or where necessary to take steps at your request prior to entering an employment contract;
- **To respond to your inquiries and communicate with you about your application.** We will engage in these activities to comply with a legal obligation, based on our legitimate interests and/or where necessary to take steps at your request prior to entering an employment contract;
- **To comply with or monitor compliance with any applicable law or regulation.** We will engage in these activities to comply with a legal obligation and/or based on our legitimate interests;
- **To preserve our other legitimate interests, for example, for Bristan Group's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Bristan Group;**
- **To comply with applicable law, respond to requests from public and government authorities, and cooperate with law enforcement.** This can include laws and authorities outside your country of residence. We will engage in these activities to comply with a legal obligation and/or based on our legitimate interests;
- **For other legal reasons, such as to enforce our terms and conditions; and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others.** We will engage in these activities to comply with a legal obligation, based on our legitimate interests and/or where necessary to protect your vital interests or that of another person; and
- **In connection with a sale or business transaction.** We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

If we hire you, personal information we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.



Providing personal information to us to apply for a job is voluntary. However, if you do not provide sufficient information, Bristan Group may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer or relocation.

#### How we share your personal information

We disclose personal information to HR and departments throughout Bristan Group to fulfil the purposes set out above. This may include transferring personal information to other countries.

Access to personal information within Bristan Group will be limited to those who have a need to know the information for the purposes described above and will include individuals responsible for assessing your application and providing IT support.

From time to time, Bristan Group will need to make personal information available to other unaffiliated third parties. Some of these unaffiliated third parties will be located outside of the UK, including in the United States or any other country in which we or they have operations. For a list of the Bristan Group affiliates that process and use personal information (and their locations), please contact the HR team.

Note that some of the non-EEA countries are recognized by the European Commission and the UK government as providing an adequate level of protection according to EEA standards. For transfers from the EEA or UK to countries not considered adequate by the European Commission or the UK government, respectively, we have put in place adequate measures, such as standard contractual clauses, to protect your personal information. You may obtain a copy of these measures by contacting us using the details set out below in the Contact Us section of this Policy.

We will share personal information with the following unaffiliated third parties:

- Professional advisors: Accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries where Bristan Group operates.
- Service providers: Companies that provide services to us, including companies that help us with job applications and service providers who provide recruiting, background check, consulting, IT and other services.
- Public and Governmental authorities: Entities that regulate or have jurisdiction over Bristan Group such as regulatory authorities, law enforcement and public and judicial bodies.
- Corporate transactions: A third party in connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Bristan Group's business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- Other third parties that you have authorized or directed to share personal information with us, such as family members.

#### Retention periods and data security

Bristan Group will take reasonable steps to ensure that personal information processed is reliable for its intended use and is accurate and complete for carrying out the purposes described in this Policy. Bristan Group will retain personal information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by law. Specifically:



- Applications from rejected applicants will be irrevocably deleted from our applicant system 6 months after rejection; and
- When you provide your consent for us to retain your application for the purpose of assessing your suitability for future roles, we will delete your application two years after inclusion in our applicant pool, or earlier if you withdraw your consent.

Bristan Group will take appropriate measures to protect personal information that are consistent with applicable privacy and data security laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of personal information.

#### Our applicant pool

If we do not have a suitable vacancy for you at the time of your application, but we come to the conclusion based on your profile that your application could also be of interest to other areas of the Bristan Group, we will store your application information in our applicant pool for a maximum of 24 months so that we can contact you again at a later date. If we decide to include your personal information in our applicant pool, we will obtain your consent to this in a separate e-mail. After a maximum of 24 months, your personal information will be automatically deleted from the applicant pool without any special notification or further archiving.

#### Choices and access

If you would like to request to correct, update, suppress, restrict or delete personal information, object to the processing of personal information, or if you would like to request to receive an electronic copy of your personal information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us by using the address in the 'Contact Us' section below. We will respond to your request consistent with applicable law.

In your request, please make clear what personal information you would like to access or have changed, whether you would like to have personal information that you have provided to us suppressed from our database.

For your protection, we only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. Please note that certain personal information may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

You also may lodge a complaint with the UK Information Commissioner's Office (<https://ico.org.uk/>).

#### Links to third party websites

This Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which this policy links. The inclusion of a link does not imply endorsement of the linked site or service by Bristan Group.

#### Diversity

Bristan Group is an equal opportunity employer, which means we offer equal treatment to all applicants. Bristan Group does not discriminate, either directly or indirectly, on protected



grounds: race, colour, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status or genetic information in any area of recruitment.

#### Law applicable to job application

If we share your personal information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your personal information in accordance with this Policy. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

#### About children

Bristan Group does not knowingly process the personal information of the age of 18 for the purposes set out in this Policy.

#### Changes to the policy

We reserve the right to amend this Policy at any time in order to address future developments of Bristan Group or changes in industry or legal trends. Any changes will become effective when we post the revised Policy on our websites.

#### Contact us

If you have questions or requests, please feel free to contact us at [hr@bristan.com](mailto:hr@bristan.com) or at HR Team, Bristan Group Limited, Bich Coppice Business Park, Tamworth, B78 1SG.