



Candidate Privacy Notice (EU)

Atlas Arteria Limited
Atlas Arteria International Limited

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1.1 Introduction

For the purposes of this document, **Atlas Arteria** means Atlas Arteria Limited ACN 141 075 201 (**ATLAX**), Atlas Arteria International Limited Registration No 43828 (**ATLIX**) and their respective controlled entities.

Atlas Arteria is committed to protecting the privacy and security of your Personal Information. We are a data controller. This means we are responsible for deciding how we hold and use personal information about you. This Notice explains to you how, why and when we process your personal data.

1.2 What is the purpose of this document?

This Privacy Notice informs you of how and why your personal data will be used (namely for the purposes of recruitment), and how long for which it will be retained. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR) and the local data protection law.

We (as data controller) are responsible for deciding how we hold and use personal information about you (as data subject). This Notice explains to you what decisions we have taken in relation to that information.

1.3 What is personal data?

“Personal data” or “personal information” as used in this Notice, means any information that can be used to identify you, whether directly or indirectly, including by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

1.4 General Data Protection principles

In collecting and processing your personal information, we will comply with the data protection laws in force at the time. These require that the personal information we hold about you must 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 as long as necessary for the purposes we have told you about; and
- kept securely.

1.5 The kind of information we hold about you

In connection with your application, we will collect, use and store the following categories of personal data about you:

- data you have provided to us in your curriculum vitae (CV) and in your covering letter;
- data you have provided in our application form, including name, title, home/term address, telephone number, personal email address, date of birth, gender, employment history, qualifications, nationality, social media accounts, profession, professional memberships, educational achievements, diplomas, transcripts, languages, computer skills, identification number and any data you provide us during the recruitment process, either in writing or verbally; and
- data provided to us about you by your referees, as the case may be.

1.6 How is your personal information collected?

We collect personal data about candidates from the following sources:

- you, the candidate;
- an employment agency or background check provider, as the case may be;
- your named referees, from whom we collect the following categories of data: full name, periods of previous employment, performance during previous employment;
- publicly accessible sources, such as LinkedIn, etc., where we may collect your full name, email, work history, and other data included on your profile; and
- answers you may provide by completing questionnaires and/or tests on psychometric testing software, as the case may be.

1.7 How we will use information about you

We will use the personal data we collect about you to:

- assess your skills, qualifications, and suitability for the role;

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- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

It is in our legitimate interests to use this information to decide whether to appoint you to the role. We also need to process your personal data to decide whether to enter into a contract with you.

Having received your CV, covering letter and the results of any tests you have taken, we will process that data to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether, on the basis of your application, to invite you for an interview. If we decide to interview you, we will use any data you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we may then check references and/or complete other checks, before confirming your appointment.

1.8 Situations in which we will use particularly sensitive personal information

We will use your sensitive personal information only in so far as we are permitted by law to do so.

- We will use data about your disability status to consider whether we need to make appropriate adjustments during the recruitment process, for example adjustments to a test or interview.
- We will use data about your nationality to assess whether a work permit and a visa will be necessary for the role.

1.9 If you fail to provide personal information

If you fail to provide certain information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application further.

1.10 Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose,

we will notify you and explain the legal basis that allows us to do so.

Please note that we may process your personal information without your knowledge or consent in compliance with the above rules, where this is required or permitted by law.

1.11 Do we need your consent to use particularly sensitive information?

We do not need your consent if we use your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

1.12 Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

Our 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.

1.13 Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to our employees, agents, contractors and other third parties on a “need-to-know” basis. 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 security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

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1.14 Transfer of your data outside of the EEA

Your personal data may be collected, used, processed, stored or disclosed by us and our service providers outside of the EEA, including in Australia and in the U.S., and in some cases, other countries. These countries may have data protection laws that are different to the laws of your country. We only transfer personal data to another country, including within Atlas Arteria group, in accordance with applicable privacy laws, and provided there is adequate protection in place for the data.

1.15 Data retention

We will retain your personal data only for as long as necessary to fulfil the purposes for which we collected it for. This includes where required under applicable law, for our legitimate interest, or for the establishment, exercise, or defence of legal claims.

If your application is successful and you accept our offer, your personal information will be transferred to your personnel file and retained during your employment in accordance with our Employee Privacy Policy of which you will receive a copy through our offer process.

If you are unsuccessful, we shall retain your personal data for a period of up to 12 months from the date we notify you about the outcome of your application (subject to any applicable legal or regulatory obligations to retain such information for a longer period).

If we wish to retain your personal information on file, in case any similar jobs/roles become available for which you will be a fitting candidate, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymise it or, if this is not possible (e.g., because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible. We reserve the right to use such anonymised data for any legitimate business purpose, without further notice to you or your consent.

1.16 Your rights in connection with personal information

Under certain circumstances, the law grants you specific rights. These are summarised below

(please note that your rights may be limited and subject to restrictions in certain situations).

- **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 processing it lawfully.
- **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 (see below).
- **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 this ground. 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.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact privacy@atlasarteria.com.

1.17 Changes to this Privacy Notice

We may change this Notice from time to time. Any changes to this Privacy Notice will become effective upon posting of the revised Privacy Notice via Atlas Arteria’s website. Each version of this Notice is identified at the bottom of the page by its version date.

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1.18 Address data protection queries

You have the right to make a complaint at any time to the *Commission nationale pour la protection des données* (CNPD), the Luxembourg supervisory authority for data protection issues.

If you have any questions about this Privacy Notice, please contact privacy@atlasarteria.com.