

EMPLOYMENT APPLICANT FAIR PROCESSING NOTICE

Introduction

Jardine Lloyd Thompson Group plc and our [Associated Companies](#) ("JLT", "we", "our" or "us") hold and [process](#) your [Personal Information](#) in connection with your prospective employment by JLT or contracting relationship ("staff" or "you" or "your") with JLT. The term "employment" used in this Fair Processing Notice means your prospective relationship with JLT, whether as an employee (temporary or permanent) or service provider in a contracting relationship.

The identity and contact details of each of the [Associated Companies](#) that are covered by this Fair Processing Notice are available [here](#). These companies are the [Data Controllers](#) referred to in this Fair Processing Notice.

We take your data protection rights and our legal obligations seriously. Your [Personal Information](#) will be treated in a secure and confidential manner and only as set out in this Fair Processing Notice.

This Fair Processing Notice describes the categories of [Personal Information](#) we [process](#), how your [Personal Information](#) may be [processed](#) and how your privacy is safeguarded in the course of your application for employment with JLT. It is intended to comply with our obligations to provide you with information about JLT's [processing](#) of your [Personal Information](#) under applicable European and UK privacy laws. It does not form part of any contract of employment or engagement that you may be offered.

If you have any questions regarding the [processing](#) of your [Personal Information](#) or if you believe your privacy rights have been violated, please contact the Data Protection Officer of the relevant JLT entity that you are applying for employment with and whose contact details are available [here](#).

Processing of [Personal Information](#)

JLT collects and [processes](#) your [Personal Information](#) for the purposes described in this Fair Processing Notice, in accordance with the principles set out by law or in any of our Group and local data protection policies.

The relevant [Associated Company](#) of JLT to whom you are applying for employment will be the [Data Controller](#) of your [Personal Information](#)

What data do we [process in respect of your application for employment](#)?

[Personal Information](#)

We may collect various types of [Personal Information](#) about you for the purposes described in this Fair Processing Notice including:

- *Personal related data:* your title, forename, middle name(s) and surname, birth name, preferred name, any additional names, gender, nationality, second nationality, civil/marital status, date of birth, age, home contact details (e.g. address, telephone number, e-mail), immigration and eligibility to work data, languages spoken;
- *Recruitment data:* qualifications, references, curriculum vitae and application, interview and assessment data;
- *Remuneration and benefits data:* your current, previous and expected remuneration information (including salary/hourly plan/contract pay information as applicable, allowance, bonus, benefit and merit plans).

Certain additional information may be collected where this is necessary and permitted by local applicable laws.

[Special Categories of Data](#)

We do not require any of your [Special Categories of Data](#), sometimes called "sensitive personal data" for the purpose of processing your application for employment. If your application for employment with us is successful we will need to carry out criminal records checks at the point we make an offer of contract to you that you choose to accept. Please do not provide us with any criminal records related information until that time.

How does JLT collect data?

JLT collects and records your [Personal Information](#) from you or from a recruitment agent authorised to act on your behalf. You or your recruitment agent will usually provide this information directly to us through our employment application portals on our website(s), by entering it onto our systems, by emailing or posting it to us or through verbal information (which may or may not be recorded). In addition, further information about you will come from those personnel in JLT who carry out interviews with you such as our managers or HR or from external parties who perform competency or psychometric tests on our behalf.

Where we ask you to provide [Personal Information](#) to us on a mandatory basis, we will inform you of this at the time of collection and in the event that particular information is required by statute this will be indicated. Failure to provide any mandatory

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information will mean that we cannot continue to consider you for employment with JLT. For example, if you do not provide us with your relevant experience we will be unable to consider you for a role at JLT. In some cases it may mean that we are unable to consider you as a candidate as JLT will not have the [Personal Information](#) we believe to be necessary for the effective and efficient administration and management of our relationship with you.

Please contact the relevant Data Protection Officer if you have any questions regarding the source of your [Personal Information](#) or would like more detail than is set out in this Fair Processing Notice.

What is the purpose and lawful basis for which data are processed?

Your [Personal Information](#) is collected and [processed](#) for the purpose of determining your suitability for the job role within JLT that you have applied for.

Where applicable data protection laws require us to process your [Personal Information](#) on the basis of a specific lawful justification, we generally process your [Personal Information](#) under one of the following bases:

- the processing is necessary for the legitimate interests pursued by JLT (being those purposes described in the table below), except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of [Personal Information](#);
- the processing is necessary for compliance with a legal obligation to which JLT is subject; or
- the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract.

We may on occasion process your [Personal Information](#) for the purpose of the legitimate interests pursued by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of [Personal Information](#).

We have identified the following purposes for [processing Personal Information](#). These purposes each relate to a lawful basis for [processing](#), as required under applicable law. These purposes include:

No.	Purpose for processing	Lawful basis
a)	Recruitment and selection;	This processing is <u>necessary to take steps at the applicant's request to enter a contract of employment</u> . This processing is also necessary for the purpose of the <u>legitimate interests</u> pursued by JLT. JLT considers that it has a legitimate interest in fully assessing applications for employment to ensure that only suitable and appropriate candidates are both assessed and selected.
b)	Complying with applicable laws and regulation (for example employment laws and regulation);	This processing is <u>necessary for the compliance with legal obligations</u> to which JLT is subject.
c)	To enforce our legal rights and obligations, and for any purposes in connection with any legal claims made by, against or otherwise involving you;	This processing is <u>necessary to perform the contract</u> between you and JLT and for the <u>compliance with legal obligations</u> to which JLT is subject. This processing is also necessary for the purpose of the <u>legitimate interests</u> pursued by JLT. JLT considers that it has a legitimate interest in protecting its organisation from breaches of legal obligations owed to it and to defend itself from litigation.
d)	To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities;	This processing is <u>necessary to comply with our legal obligations</u> .
e)	Other purposes permitted by applicable laws, including legitimate interests pursued by JLT where these are not overridden by the interests or fundamental rights and freedoms of staff.	

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Retention of [Personal Information](#)

JLT endeavours to ensure that [Personal Information](#) is kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable. However, some [Personal Information](#) may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

We will generally retain your [Personal Information](#) only so long as it is required for purposes for which it was collected and in accordance with JLT's Records Management Policy. This will usually be 6 months for unsuccessful [Job Applicants](#) and, for successful [Job Applicants](#), the period of your employment with us plus the length of any applicable statutory limitation period following your departure.

We maintain a Records Management Policy which we apply to records in our care. Where your [Personal Information](#) related to your application for employment with us is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

Access to data

Within JLT, your [Personal Information](#) can be accessed by or may be disclosed internally on a need-to-know basis to:

- local, regional and global Human Resources, including managers and team members;
- local, regional and executive management responsible for managing or making decisions in connection with your application for employment with JLT or when involved in an HR process concerning your application for employment with JLT (including, without limitation, staff from Legal and IT);
- system administrators; and
- where necessary for the performance of specific tasks or system maintenance by staff in JLT teams such as the IT and the Global HR information systems support teamS.

The security measures in place within JLT to protect your data are set out below.

Your [Personal Information](#) may also be accessed by third parties whom we work together with (including without limitation, service providers, third party contractors, their associated companies and sub-contractors) for providing us with services, such as hosting, supporting and maintaining the framework of our IT systems or carrying our competency or psychometric tests on our behalf.

[Personal Information](#) may also be shared with certain interconnecting systems such as recruitment systems. Data contained in such systems may be accessible by providers of those systems, their associated companies and sub-contractors.

Examples of third parties with whom your data will be shared include JLT's IT infrastructure providers. JLT expects such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security. Where these third parties act as a [Data Processor](#) (for example, an IT Infrastructure provider), they carry out their tasks on our behalf and upon our instructions for the above mentioned purposes. In this case your [Personal Information](#) will only be disclosed to these parties to the extent necessary to provide the required services.

In addition, we may share [Personal Information](#) with national authorities in order to comply with a legal obligation to which we are subject. This is for example the case in the framework of imminent or pending legal proceedings or a statutory audit.

Please contact the relevant Data Protection Officer if you have any questions regarding recipients of your [Personal Information](#) or would like more detail than is set out in this Fair Processing Notice.

Security of data

JLT uses a variety of technical and organisational methods to secure your [Personal Information](#) in accordance with applicable laws.

JLT is committed to protecting the security of the [Personal Information](#) you share with us. In support of this commitment, we have implemented appropriate technical, physical and organisational measures to ensure a level of security appropriate to the risk.

A number of the measures that we use to protect information are set out in our Group Security Statement, which sets out the applicable JLT policies.

Transfer of [Personal Information](#)

From time to time your [Personal Information](#) will be transferred to [Associated Companies](#) and other companies within the [JLT Group](#) as well as to service providers to [process](#) for the purposes described in this Fair Processing Notice.

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These companies may be located within the [EEA](#), India and as necessary within other JLT offices worldwide. [Personal Information](#) may also be transferred to third parties, as set out above. As a result, your [Personal Information](#) may be transferred to countries outside of the country in which you work and outside of the [EEA](#) to countries whose data protection laws may be less stringent than those in the [EU](#).

JLT will ensure that appropriate or suitable safeguards are in place to protect your [Personal Information](#) and that the transfer of your [Personal Information](#) is in compliance with applicable data protection laws. Where required by applicable data protection laws, JLT has ensured that service providers (including its [Associated Companies](#) and other companies within the [JLT Group](#)) sign standard contractual clauses as approved by the European Commission or other [Supervisory Authority](#) with jurisdiction over the relevant data exporter or use other lawful transfer mechanisms such as US Privacy Shield. You can obtain a copy of any standard contractual clauses or lawful transfer mechanisms in place which relate to transfers of your [Personal Information](#) by contacting the relevant Data Protection Officer, although some details may be redacted for confidentiality reasons.

Your rights

Right to access, correct and delete your [Personal Information](#)

JLT aims to ensure that all [Personal Information](#) are correct. You also have a responsibility to ensure that the [Personal Information](#) you provide to us is correct and that changes in your personal circumstances (for example, change of address) are notified to JLT so that we can ensure that your data is up-to-date.

You have the right to request access to any of your [Personal Information](#) that JLT may hold, and to request correction of any inaccurate data relating to you. You furthermore have the right to request deletion of any irrelevant data we hold about you.

Additional rights

You also have the following additional rights:

- *Data portability* - where we are relying upon your consent or the fact that the [processing](#) is necessary for the performance of a contract to which you are party as the legal basis for [processing](#), and that [Personal Information](#) is processed by automatic means, you have the right to receive all such [Personal Information](#) which you have provided to JLT in a structured, commonly used and machine-readable format, and also to require us to transmit it to another [Data Controller](#) where this is technically feasible.
- *Right to restriction of [processing](#)* - you have the right to restrict our processing of your [Personal Information](#) where:
 - you contest the accuracy of the [Personal Information](#) until we have taken sufficient steps to correct or verify its accuracy;
 - where the [processing](#) is unlawful but you do not want us to erase the data;
 - where we no longer need the [Personal Information](#) for the purposes of the [processing](#), but you require them for the establishment, exercise or defence of legal claims; or
 - where you have objected to [processing](#) justified on legitimate interest grounds (see below) pending verification as to whether JLT has compelling legitimate grounds to continue [processing](#).

Where [Personal Information](#) is subjected to restriction in this way we will only [process](#) it with your consent or for the establishment, exercise or defence of legal claims.

- *Right to withdraw consent* - where you have provided us with your consent to [process](#) data, you have the right to withdraw such consent at any time. You can do this by contacting the relevant JLT Entity Data Protection Officer whose contact details are available [here](#).
- *Right to object to processing justified on legitimate interest grounds* - where we are relying upon legitimate interest to [process](#) data, then you have the right to object to that [processing](#). If you object, we must stop that [processing](#) unless we can either demonstrate compelling legitimate grounds for the [processing](#) that override your interests, rights and freedoms or where we need to [process](#) the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for [processing](#) we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

You also have the right to lodge a complaint with a [Supervisory Authority](#), in particular in your country of residence, if you consider that the [processing](#) of your [Personal Information](#) infringes applicable law.

For further information regarding your rights, or to exercise any of your rights, please contact the relevant Data Protection Officer.

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Notice of changes

JLT may change or update this Fair Processing Notice at any time. This Fair Processing Notice was last updated and reviewed on 17 August 2018.

GLOSSARY OF TERMS

Glossary of Terms
<p>Associated Companies means the companies listed here</p>
<p>Data Controller means a natural or legal person (such as a company) which determines the means and purposes of processing of Personal Information. For example, the JLT entity which contracts with you will be your Data Controller as it determines how it will collect Personal Information from you, the scope of data which will be collected, and the purposes for which it will be used.</p>
<p>Data Processor means a natural or legal person (such as a company) that processes Personal Information on behalf of a Data Controller.</p>
<p>EEA means the European Economic Area, which includes all countries in the EU and also Iceland, Liechtenstein and Norway.</p>
<p>EU means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the UK.</p>
<p>JLT Group means any subsidiary of Jardine Lloyd Thompson Group plc.</p>
<p>Job Applicant means an individual who applies for temporary, fixed term or permanent employment with an Associated Company</p>
<p>Personal Information is information that relates to a living individual. It includes information that may identify a person by name and contact details, or refer to associated information such as account activity, or personal preferences that can directly or indirectly identify an individual.</p>
<p>Process/Processing/Processed means any and all actions we take with respect to your Personal Information, including (without limitation) managing, viewing, holding, storing, deleting, changing, using and saving.</p>
<p>Special Categories of Data means any Personal Information relating to your health, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership.</p>
<p>Supervisory Authority means the supervisory authority for data protection, which in the United Kingdom is the ICO (https://ico.org.uk/).</p>

JLT Associated Companies and Contacts

Associated Company Name	Country	Data Protection Officer and Contact Details
Belgibo N.V	Belgium	Ines Vermeire JLTBelgibo_DPO@belgibo.be Data Protection Officer De Gerlachekaai 20, 2000, Antwerpen, Belgium
CMC Belgibo	Belgium	
JLT Specialty Insurance Broker A/S	Denmark	Ines Vermeire JLTNE_DPO@jltgroup.com Data Protection Officer Hellerupgaardvej 18, 2900 Hellerup, Denmark
JLT PLA	France	Ines Vermeire JLTNE_DPO@jltgroup.com Data Protection Officer 94 Rue de la Victoire, 75009 Paris 9, France
OWL Marine Insurance-	Germany	Ines Vermeire

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Associated Company Name	Country	Data Protection Officer and Contact Details
Brokers GmbH & Co. KG		JLTNE_DPO@jltgroup.com Data Protection Officer Morgan Haus, Große Bäckerstraße 9, 20095 Hamburg, Germany
JLT Risk Management Limited	Ireland	Finbarr Walsh JLTirelandDPO@JLT.ie Data Protection Officer Friends First House, Cherrywood Business Park, Loughlinstown, Dublin 18, D18 W2P5
International Loss Control Services Limited	Ireland	
JLT Insurance Brokers Ireland Limited	Ireland	
JLT Financial Planning Limited	Ireland	Martin Elcoate EB_DataProtectionOfficer@JLTGroup.com Data Protection Officer Friends First House, Cherrywood Business Park, Loughlinstown, Dublin 18, D18 W2P5
JLT Netherlands BV	Netherlands	Ines Vermeire JLTNE_DPO@jltgroup.com Data Protection Officer Schouwburgplein 30, 3012 CL Rotterdam, Netherlands
JLT Norway AS	Norway	Ines Vermeire JLTNE_DPO@jltgroup.com Data Protection Officer Strandveien 13, 1366 Lysaker, Norway
JLT Re (Northern Europe) AB	Sweden	Paul McCarter JLTRE_DPO@JLTRe.com Data Protection Officer Jakobsbergsgatan 7, 111 44 Stockholm, Sweden
JLT Risk Solutions AB	Sweden	Ines Vermeire JLTNE_DPO@jltgroup.com Data Protection Officer Jakobsbergsgatan 7, 111 44 Stockholm, Sweden
Lavaretus Underwriting AB	Sweden	
GCube Underwriting Limited	United Kingdom	Genette Carr GCube_UKDPO@Gcube-insurance.com Data Protection Officer 155 Fenchurch Street, London, EC3M 6AL
Chartwell Healthcare Limited	United Kingdom	Martin Elcoate EB_DataProtectionOfficer@JLTGroup.com Data Protection Officer 1st Floor, Rosemoor Court, Pynes Hill, Exeter, EX2 5TU
Chartwell Direct Marketing	United Kingdom	
Independent Trustee Services Limited	United Kingdom	
JLT Benefit Solutions Limited	United Kingdom	
JLT Investment Management Limited	United Kingdom	
JLT Wealth Management Limited	United Kingdom	
Profund Solutions Limited	United Kingdom	
JLT Management Services Limited	United Kingdom	Angela Isom JLTMS_UKDPO@JLTGroup.com Data Protection Officer 9 th Floor, St Botolph Building, 138 Houndsditch, London, EC3A 7AW
JLT Reinsurance Brokers Limited	United Kingdom	Paul McCarter JLTRE_DPO@JLTRe.com Data Protection Officer 7 th Floor, The St Botolph Building, 138 Houndsditch, London, EC3A 7AW
JLT Specialty Limited	United Kingdom	Genette Carr JLTSL_UK_DPO@JLTGroup.com Data Protection Officer 6 th Floor, St Botolph Building, 138 Houndsditch, London, EC3A 7AW