

VGW Candidate Privacy Policy

At VGW, we are committed to protecting and respecting your privacy. This privacy policy (“**Privacy Policy**”) explains how your personal information is collected, why it is collected and how it is kept secure.

This Privacy Policy governs how VGW Holdings Limited, together with its subsidiaries and affiliates from time to time (“**VGW Group**”) collect, use, maintain and disclose information collected from our job candidates (“**Candidates**”).

This Privacy Policy is issued on behalf of the VGW Group so when we mention “**VGW**”, “**we**”, “**us**” or “**our**” in this Privacy Policy, we are referring to the relevant company in the VGW Group responsible for processing your information.

Types of information we collect

The personal information VGW collects, uses and stores includes:

- Contact information: such as your full name, email address, home address and telephone number
- Professional history and qualifications: such as your previous employers, positions and work experience, professional licenses, certificates and qualifications, and employment references or referrals
- Educational history and qualifications: such as your highest level of education, degrees, certificates or other education qualifications
- Financial Information: such as your desired salary, benefits, and expenses. You may volunteer your previous salary and/or financial package.
- Background check information: when permitted by law, we may choose to conduct a background check in connection with your application to verify professional history and qualifications or identify criminal history that may be relevant for a position with us. The results of these checks may include personal information we do not already have about you.
- Other application and interview information: any personal information you choose to share with us in your interview or application, CV, resume, or other supporting documentation or help us coordinate requirements for an interview.

Although we often collect the personal information described above directly from you, we may also proactively collect certain information from references, recruiters, job-related social media sites (such as LinkedIn), and publicly available sources. In addition, we may also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, scheduling providers and application providers.

How we use collected information

In accordance with applicable laws, we may collect and use personal information for the following purposes:

- identifying you as a potential candidate and reviewing your application for a position with us
- verifying the information provided to us in connection with your application
- determining eligibility for initial employment, including the verification of references and qualifications and adhering to legal obligations including but not limited to AML requirements

VGW Candidate Privacy Policy

- facilitating the recruiting and interviewing process
- communicating the status of your application
- fulfilling contractual obligations to you in the event you become an employee
- complying with applicable law, rule, regulation, legal proceeding and government investigations, including relating to tax reporting and immigration
- such other purposes as are reasonably required by VGW.

How we protect your information

We have in place, physical, electronic and operational procedures to protect the information that we collect. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored in our environment. Our security measures are reviewed regularly and updated in keeping with technological advances.

How long will we retain your information

We will retain your information for the period of time required to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

If your application is successful and you become an employee, where permitted by law the personal information may be transferred to your personnel file and stored in accordance with our Employee Privacy Policy which you will receive upon commencement with us.

If your application is not successful, we may also keep your personal information for the purpose of considering your application for employment for other positions within the VGW Group.

Sharing your information

We do not sell, trade, or rent Candidate personal information to others. From time to time, we may utilize the services of third parties (including companies within VGW Group) in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us. Where this is the case, we will take reasonable steps to ensure that they have demonstrated that they have the right to disclose your personal information to us.

Your personal information may also be disclosed for:

- provisioning human resources management
- provisioning VGW Group IT infrastructure
- processing of salary and benefits payments
- coordinating travel accommodation for our candidates
- conducting background checks and
- provisioning of professional recruitment and talent management services.

Transfers

VGW Group operates in several international jurisdictions and personal information we collect may be transferred to, stored and processed by, individual companies in the VGW Group or third parties

VGW Candidate Privacy Policy

in the European Union, the United States, Canada, Australia, the Philippines or any other country in which we or our third party processors maintain facilities. We will ensure that transfers of personal information to any country or organization are subject to appropriate safeguards.

Additionally, without limitation and where applicable, when transferring personal information from the European Union, we may use standard contractual clauses approved by the European Commission or otherwise adopt other means in accordance with European data protection laws for ensuring adequate safeguards.

Your rights over your information

We appreciate that by law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. These rights include the right to access the personal information we hold about you, the right to object to the processing of your data and the right to withdraw any consent provided. In some circumstances, you can ask us to delete the personal information we hold about you.

To exercise the rights described above please complete the VGW Group Access Request Form [here](#) or alternatively email dataprivacy@vgw.co.

Right to complain to a supervisory authority

You also have the right to complain to the relevant data protection supervisory authority about our processing of your personally identifiable information. For further information on how, please contact us at dataprivacy@vgw.co.

Your California Privacy Rights

California residents may learn more about their rights, including how to exercise their rights under the California Consumer Privacy Act of 2018, by clicking [here](#).

Revisions to the Policy

We may update the Policy from time to time, and when we do, we will reissue a revised Policy and notify all candidates of any changes, to the extent required by law.

Questions

If you have specific questions regarding your personal information or how we use it, please contact our Data Protection Officer by email dataprivacy@vgw.co and specify your place of residence and the nature of your question.

VGW Candidate Privacy Policy

Policy Version History

Version	Date	Description	Approved by
1.0	22/11/2021	Initial Policy Drafted	DPO
2.0	17/05/2022	Review	Head of People Services Head of Talent Acquisition