CANADA VGW CANDIDATE PRIVACY POLICY

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Canada 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 the VGW Group may collect, use, maintain and disclose information from our job candidates ("**Candidates**").

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

Definitions

Personal Information means any information about you, whether it is true or not, that can reasonably be used to identify you, or otherwise make you identifiable, and any other information that is deemed Personal Information under applicable law.

Sensitive Personal Information is a subset of Personal Information that requires a higher level of protection. This includes information such as financial, biometric and health data.

Artificial Intelligence (AI) refers to systems and intelligence tools (including machine learning or otherwise automated tools) that can learn from data and experiences and can help computers do tasks that normally require human intelligence. AI systems can do things like understand language, recognise images, make decisions, and even predict future outcomes.

How we collect your information

- **Directly from you:** We collect information you provide directly to us during your application process with VGW, by either electronic, telephone, video or in-person means.
- **Personal and professional references:** We may gather information from previous employers, supervisors, other staff, recruitment agents, and personnel providers where relevant to the hiring process.
- **Publicly available information:** We may also proactively collect certain information from job-related social media sites (such as LinkedIn), and publicly available sources.
- **Third party service providers:** We engage third party service providers, such as background check agencies, police authorities and recruiters, to help us fulfill the purposes detailed in this Privacy Policy and to ensure regulatory compliance. These service providers may assist in collecting, processing, and storing your information.

Types of information we collect

We will only collect your information when necessary to fulfil the purposes outlined in this Privacy Policy, and where required by the law.

We may collect, use and store the following categories of Personal Information:

- **Contact Details:** such as your full name, email address, home address and telephone number.
- **Personal Identification:** your date of birth, gender, nationality, signature, photograph, and video.
- **Family information:** any disclosed details of friends and/or relatives for referrals or managing any perceived or potential conflicts of interest.
- **Professional history and qualifications:** such as your previous employers, positions and work experience, professional licenses, certificates and qualifications, right to work, immigration status and work permit data, and employment references or referrals.
- **Financial Information:** such as your desired salary, benefits, and expenses. You may volunteer your previous salary and/or financial package.
- **Sensitive Personal Information:** biometric information (including your voice and image) and criminal history.
- **Other application and interview information:** any Personal Information you choose to share with us in your interview or application, CV, resume, other supporting documentation such as government-issued identification, or to help us coordinate requirements for an interview.

How we use collected information

In accordance with applicable laws, we may collect and use your Personal Information for the following purposes:

- Identifying you as a potential candidate and reviewing your application for a position with VGW.
- Verifying the information provided to us in connection with your application.
- Determining your eligibility for employment, including the verification of references and qualifications and adhering to legal obligations including but not limited to AML requirements.
- Facilitating the recruitment and interview process.
- Communicating the status of your application to you.
- Fulfilling any contractual obligations to you in the event you become an employee of VGW.
- Complying with applicable laws, rules, regulations, legal proceedings and government investigations, including relating to safety, employment and immigration legislation, or for taxation purposes.
- When permitted by law, we may choose to conduct a background check in connection with your application to verify professional history and qualifications, visa or residency status, or identify criminal history that may be relevant for a position with VGW.
- Other purposes as reasonably required by VGW, with your consent.

In some instances, we may use de-identified or anonymised data so that it can no longer identify you and will take reasonable steps to notify you and gain consent, unless we have a legitimate business purpose to use such data without further notice to you or your consent.

Artificial Intelligence

At VGW, we may use AI technologies to enhance various aspects of our operations, including for the recruitment of staff. These AI technologies may include tools utilised by VGW for the recording and screening of candidates during the application process. We do not make hiring decisions based on automated decision-making processes. Hiring decisions are made by hiring managers or recruiters. Before implementing any AI technology, we conduct a risk assessment to identify and evaluate potential risks related to data security, regulatory compliance, and privacy implications.

How we protect your information

We have in place, physical, electronic and operational procedures to protect your Personal 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, 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

If your application is successful and you become an employee of VGW, your Personal Information may be transferred to your personnel file and stored in accordance with VGW's Employee Privacy Policy, which you will receive upon commencement with us. If your application is not successful, we may keep your Personal Information for up to 3 years for the purpose of considering your application for employment for other positions within the VGW Group, or as required by relevant laws. After this period, we will securely destroy your Personal Information in accordance with VGW's data and document retention policy.

Sharing your information

We do not sell, trade, or rent candidate Personal Information to others. We may utilize the services of third parties (including companies within the 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 and meet VGW's privacy and security requirements.

Your Personal Information may also be shared for:

- provisioning human resources management.
- provisioning VGW Group IT infrastructure.
- coordinating travel accommodation for our candidates.
- conducting background checks and to comply with any other valid legal obligations or processes.
- provisioning of professional recruitment and talent management services.

We will only disclose the minimum Personal Information that is required in such specific purposes and circumstances.

Transfers

The VGW Group operates in several international jurisdictions, including Australia, Canada, the European Union, the Philippines and the United States. Your Personal Information may be transferred to, stored and processed by individual companies in the VGW Group or third parties located in these jurisdictions.

We will ensure that transfers of your Personal Information to any international country or organization are subject to appropriate safeguards and the transfer is necessary for the purposes set out in this Policy. The protection of your Personal Information in these jurisdictions are subject to the legal requirements of the jurisdiction to which we transfer the Personal Information. This includes lawful requirements to share information to law enforcement and government agencies in those countries and any safeguards required for data transfers including those set by the GDPR.

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:

- Right to access;
- Right to rectification;
- Right to erasure (right to be forgotten);
- Right to object; and
- Rights related to automated decision-making and profiling.

To exercise the rights described above please complete the VGW Group Privacy Rights 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.

Questions

If you have specific questions regarding your Personal Information or how we use it, please contact the Data Privacy Team by email dataprivacy@vgw.co and specify your place of residence and the nature of your question.

Amendments and Review

This policy will be reviewed annually. The Privacy Team must approve all material amendments to this 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
3.0	19/12/2024	New format, updates to privacy rights, inclusion of AI use	Chief People Officer
4.0	01/01/2026	Update to retention period for unsuccessful candidates.	Chief People Officer