

Jefferies EMEA Candidate Privacy Notice

1 INTRODUCTION

This Candidate Privacy Notice (“Notice”) applies to candidates for all positions with Jefferies, whether as employees or interns to be engaged directly in Jefferies’ business, or others providing services to Jefferies (including consultants, non-executive directors, senior advisors, temps and vendor staff, even though they are not classed as employees of Jefferies) (collectively “Candidates”).

This Notice explains what we do with your personal data from the point at which you apply to work for Jefferies until after the recruitment process has ended (ie, where you accept a position or your application is otherwise closed). It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your privacy rights.

For the purpose of applicable data protection legislation, the company responsible for your personal data is Jefferies International Limited (“Jefferies” or “us”) (being the data controller) details for which can be found in section 9.

This Notice is non-contractual and we may amend it from time to time.

2 WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

In connection with your application for work at Jefferies, we collect personal data about you, including:

- Your personal contact details, namely your name, title, home address, telephone numbers and personal email addresses;
- Recruitment information about you, including: your CV, your education, qualifications and employment history referee details and details about your remuneration and benefits arrangements with current or former employers. Depending on your role, we may also ask you to provide details of any investigations, disciplinary matters litigation or claims in court, tribunal or similar forum, whether brought by or against you or in which you are otherwise involved;

We may also collect, store and use the following “special categories” of personal information (also known as “sensitive personal data”):

- Diversity information including racial or ethnic origin. Religious or other similar beliefs, sexual orientation and Trade Union membership information would only be held if volunteered by you;
- Any relationships between you and Jefferies’ staff (in particular someone who may consider your application or who may either supervise you or report to you- whether directly or indirectly) for the purposes of avoiding conflicts of interest or the appearance of favouritism/impropriety in the recruitment process;
- Health-related information including any medical condition or disability which you disclose to us for the purposes of Jefferies considering reasonable adjustments to the recruitment process to help accommodate such condition or disability;
- Information necessary to perform background checks, including details of criminal convictions or offences.

Please note that if you fail to provide (when requested) information which is necessary for us to consider your application, we will not be able to take your application further.

For details of the legal bases that we rely on to be able to use and process your personal data, please see section 5 below.

If we decide to offer you a role, then we will then take up references, carry out a criminal record and other checks, in which case we will manage your personal data in accordance with the EMEA Staff Privacy Notice which will be made available to you at the time of any offer being made.

3 HOW DO WE COLLECT YOUR PERSONAL DATA?

There are various ways that we collect your personal information with us. These include obtaining information about you from the following sources:

- Directly from you;
- From Jefferies staff or contacts (including your current and former colleagues) who know you, or third parties providing recruiting services to Jefferies (such as employment agencies or businesses, headhunters or similar);
- From third party sources such as LinkedIn and other job sites when we search for potential candidates for roles with Jefferies.
- In limited circumstances, for particularly sensitive or important roles at Jefferies, we may commission a third party to carry out a background check on our behalf during the recruitment/interviewing phase to report on and distil any information about you available through publically available sources;
- Your referees;
- Credit reference agencies.

4 HOW DO WE USE YOUR PERSONAL DATA?

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

- Communicate with you about the recruitment process and to collect your data from you and other sources described in section 3;
- Assess your skills, qualifications, and suitability for the role and to make decisions about employing or engaging you;
- Determine the terms on which you may be offered to work for us;
- Keep records related to our hiring processes, including when you applied for work for us and the outcome of that application;
- Where appropriate and in accordance with any local laws and requirements, we may use certain information (ethnic background, gender, disability, age, sexual orientation, religion or other beliefs, child care, carer arrangements and/or social-economic background) on an anonymised basis to monitor our compliance with our Equal Opportunities Policy;
- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims;
- Consider and (where appropriate) make reasonable adjustments to our application and/or recruitment process to accommodate any health conditions or disabilities disclosed by you;

We will only use your personal information for the purposes for which we collect it.

5 LEGAL BASES FOR JEFFERIES PROCESSING YOUR DATA

There are a number of different ways that organisations are lawfully able to process individuals' personal data. Jefferies will principally rely on the following when processing your personal data:

- It is in our legitimate interests to decide whether to appoint you to work with or for Jefferies since it would be beneficial to our business to appoint someone to that role or work.
- We may process your personal data where this is necessary for us to establish, exercise or defend legal claims, or in order to comply with our legal obligations; and
- We will also process your personal data where you give us your consent to do so (for example, to consider you for a role at Jefferies).

We do not think that any of the above activities prejudice you in any way. However, you do have the right to object to us processing your personal data in certain circumstances (see section 8 below).

6 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Where appropriate and in accordance with local laws and requirements, we may share your personal data with the following:

- Affiliates within the Jefferies Group;
- Colleagues within Jefferies (where appropriate, this may include colleagues in overseas offices); and
- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies, immigration agencies and employment and recruitment agencies; third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws.

All our third-party service providers and other entities in the group 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.

7 HOW DO WE PROTECT YOUR DATA?

Jefferies is committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include training for staff on handling personal data as well as measures for appropriately transferring data and dealing with any suspected data breach.

In order for us to carry out the purposes described in this Notice, your personal data may be transferred to those set out in section 6, who may be located outside of your jurisdiction. Jefferies makes sure that your data is stored and transferred in a way which is secure and will only transfer data outside of the European Economic Area (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- By way of a data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to data controllers and data processors in jurisdictions without adequate data protection laws; or
- Transferring your data to a country which has been found by the European Commission to have adequate levels of data protection; or

- Where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer your data to a benefits provider based outside the EEA); or
- In the case of transfer to the United States, the transfer is made to an entity certified under the EU – US Privacy Shield.

We will retain your personal information for a period of two years (or for such longer period as we may be required to by law) after we have communicated to you our decision about whether to engage or employ you. We retain your personal information for that period in the event that (i) a further opportunity may arise in future and we may wish to consider you for that; and/or (ii) a legal claim is brought regarding our recruitment process or decision-making. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

8 YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

Under certain circumstances, you have the following rights:

- **Access:** You may ask us to confirm, and provide copies of, the information we hold about you at any time, and request us to modify, update or delete such information (commonly known as a "data subject access request").
- **Erasure:** You have the right to request that we erase your personal data in certain circumstances.
- **Restrict processing:** You have the right to request that we 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).
- **Correction:** You also have the right to request that we rectify any inaccurate or incomplete personal data that we process or control.
- **Data Portability:** If you wish, you have the right to transfer your personal data between data controllers. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data.
- **Object to processing:** you may object to processing of your personal information where (i) 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; and (ii) we are processing your personal information for direct marketing purposes.
- **Withdraw Consent:** In the limited circumstances where you have provided, and Jefferies relies on, your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your HR representative in the first instance. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

if you wish to exercise any of these rights, please contact EMEAAsiaprivacy@jefferies.com in the first instance. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions permissible by law).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee, or otherwise refuse to comply with your request for access if it is clearly unfounded or excessive.

Where we are legally permitted to do so, we may refuse your request to exercise these rights. If we refuse your request we will tell you the reasons for doing so

Please note that we may keep a record of your communications to help us resolve any issues which you raise.

9 CONTACTS

If you have any comments, questions or concerns about any of the information in this Notice, or any other issues relating to the processing of personal data by Jefferies International Limited (being the data controller), please contact Jefferies' European Privacy Office by email EmeaAsiaprivacy@jefferies.com; or by post to: Jefferies European Privacy Office, Jefferies International Limited, Vintners Place, 68 Upper Thames Street, London EC4V 3BJ.

You also have the right to lodge a complaint with your local supervisory authority, which is the Information Commissioner's Office in the UK ("ICO"). Please contact EMEAAsiaprivacy@jefferies.com for details of supervisory authorities in other EU jurisdictions where Jefferies has offices.