## **Privacy Notice for Recruitment**

#### General

This Privacy Notice sets out how the Mourant Group ("we", "our", or "us") collects and processes personal data from you in connection with our recruitment processes.

In this Privacy Notice, "Data Protection Legislation" means all appliable legislation relating to privacy or data protection in force from time to time in any of the jurisdictions in which we operate (as the same may be amended and/or updated from time to time), including without limitation, the EU General Data Protection Regulation 2016/679 (GDPR), Hong Kong's Personal Data (Privacy) Ordinance (Ch. 486) (PDPO), and Singapore's Personal Data Protection Act(No.26 of 2012) (PDPA). The terms "controller" or "processor" will have the same or equivalent meaning as given to it under applicable Data Protection Legislation, save in respect of Hong Kong where "controller" should be construed as meaning "data user" as defined in the PDPO, and, in Singapore, where "controller" should be construed as meaning the "organisation" and "processor" should be construed as meaning "data intermediary" as respectively defined in the PDPA. We use the terms "controller" and "processor" throughout this Privacy Notice for consistency.

Any questions in relation to this Privacy Notice or requests in respect of personal data should be directed to <a href="mailto:dataprotection@mourant.com">dataprotection@mourant.com</a> in the first instance. Alternatively, in the case of Singapore, please contact Simon Berry by e-mail at <a href="mailto:simon.berry@mourant.com">simon.berry@mourant.com</a> or telephone +65 681 4590.

For the purpose of the Data Protection Legislation, the controller of any personal data collected or processed by us will be the relevant Mourant entity incorporated or established in the jurisdiction where the recruitment vacancy is located. Details of the Mourant entities who may process your data are provided at the end of this Privacy Notice.

We use Workday, an online software product provided by Workday Limited, to assist with our recruitment process. Where Workday processes personal data it does so as a processor on our behalf. Workday is only entitled to process your personal data in accordance with our documented instructions and we have agreed a data processing agreement with Workday in accordance with the applicable Data Protection Legislation.

Where you apply for a job opening posted by us, these Privacy Notice provisions will apply to our processing of your personal information, in addition to our Mourant Group Privacy Notice available on our website.

## The personal data we collect from you

We collect and process personal data from you when you apply for a job opening. This includes information provided through an online application (including via Workday), via email, in person at interview and/or by any other method during the recruitment process. In particular, we process personal details such as your name, email address, residential address, date of birth, qualifications, experience and any other information relating to your employment history, skills and experience that you provide to us. In addition, if you contact us, we may keep a record of that correspondence and we keep details of your visits to our career website including, but not limited to, traffic data, location data and other communication data, the site that referred you to our careers website and the resources that you access.

## The personal data we collect from other sources

Workday provides us with the facility to link the data you provide to us with other publicly available information about you that you have published on the internet. This may include sources such as LinkedIn and other social media profiles. Workday's technology also enables us to search various databases which may include your personal data, to find possible candidates to fill our job openings. Where we find you in this way we will obtain your personal data from these sources.

We may also receive personal data about you from recruitment agents or other businesses you liaised with in connection with your application to us.

### Purpose and lawful basis for processing

We will use your personal data for our general recruitment purposes. This includes, considering your application in respect of the job opening for which you have applied, considering your application in respect of other job openings within Mourant, to communicate with you in respect of the recruitment process, to enhance any information that we receive from you with information obtained from third party data providers, to find appropriate candidates to fill our job openings, and to help Workday improve their services.

Where permitted to do so by applicable Data Protection Legislation, we will rely on our **legitimate interests** to recruit personnel for our business as the lawful basis for such processing. Your personal data will only be processed under this lawful basis in circumstances where we can balance your legitimate interests with our own in accordance with the applicable Data Protection Legislation.

Where we are unable to rely on our legitimate interests, then in instances where you have been provided with this Privacy Notice and you provide us with your personal data thereafter, the processing may be carried out on the basis of **consent**. We will only seek to rely upon your consent where no other legal basis is available to us, and your consent may be withdrawn at any time by writing to dataprotection@mourant.com.

### Automated decision making / profiling

We may leverage Workday's technology to help us select appropriate candidates for us to consider based on criteria we have identified. This process of finding suitable candidates is automatic, however, any decision as to who we will engage to fill the job opening will be made by an appropriate member of our team.

### How we share your personal data

The provision of personal data to one Mourant Group entity may result in that data being accessible by all other Mourant Group entities. We use reasonable endeavours to ensure that data is only accessible by those with a need for access to fulfil the purposes set out above. Requests for access to data to be restricted in any particular manner should be made to <a href="mailto:dataprotection@mourant.com">dataprotection@mourant.com</a> and will be considered and, where possible with reference to legal and regulatory obligations, actioned.

Our offices include jurisdictions outside the European Union which have not been deemed adequate for European Union data protection purposes (namely, the British Virgin Islands, the Cayman Islands, Hong Kong, Mauritius, and Singapore), however, please note that we operate a global data protection policy based on the requirements of the GDPR, and those offices are expected to meet the same standard as our other offices. In addition, we have a data transfer agreement in place between each Mourant Group entity to enable information to be shared across our businesses in accordance with applicable Data Protection Legislation.

As with many businesses offering services like those of Mourant, we utilise third party IT platforms, including cloud-based platforms and subscription application services. Certain of these services (for example the use of Microsoft 365 and iManage (our document management system)) are deployed as a matter of course. The use of such services may require information to be stored or processed in a cloud or infrastructure managed by the relevant service provider. The confidentiality and security of your personal data is of key importance to us, and we conduct careful due diligence on the security of any third-party technology systems we use. In addition, and where possible, we request that service providers of cloud-based platforms and subscription application services processing information provided by us, do so using data centres based in either an EU member state or the UK.

By way of example, the personal data that we collect from you and process using Workday's services will be transferred to and stored at a datacentre in Frankfurt (Germany). By submitting your personal data, you agree to this transfer, storing or processing.

### Security

We use up-to-date storage and security to hold your data securely in electronic or physical form to protect your data from unauthorised access, improper use or disclosure, unauthorised modification or unlawful destruction or accidental loss. Our IT usage and securities policies are supported by our ISO 27001 certification and our premises are access controlled, and our electronic databases require logins and password authentication. All our partners, employees, and third-party service providers who have access to data are subject to confidentiality obligations.

Please note, however, that the transmission of information via the internet is not completely secure and although we take appropriate and proportionate steps to manage the risks posed, we cannot quarantee the security of your information transmitted to our online services.

#### Where we act as Processor

In most circumstances, we consider that each member of the Mourant Group acts as a separate and independent controller in relation to any data that they process. In certain circumstances, however, where we exercise little or no autonomy or discretion in the role that we perform in connection with the provision of services, we may act as processor under the applicable Data Protection Legislation. Where we do so, we will enter into a separate Data Processing Agreement setting out our obligations as processor of that data, which will form part of our engagement terms in connection with the provision of the relevant services.

#### Retention

Mourant only keeps data for as long as necessary to fulfil the purposes (as set out above) for which we have collected it. For recruitment purposes, our policy is to retain all candidate data for a period of 6 months from the time of application. Your personal data will be deleted on the occurrence of one of the following:

- deletion of your personal data by you via the Manage Your Data tool on the Workday candidate home; or
- receipt of a written request from you to us (see below).

Any requests for further information in relation to the continued processing of personal data, and requests for destruction of personal data, should be made to <a href="mailto:dataprotection@mourant.com">dataprotection@mourant.com</a>.

## Rights of data subjects

Data subjects who have data held by Mourant may have certain rights in respect of their personal data.

Any such data subject wishing to exercise any rights under applicable Data Protection Legislation (including the right to withdraw any consent to processing previously given; the right of access to data; or to have data corrected, updated, rectified or erased; or for access to data to be restricted to provided, to any third party; or to object to any particular processing) should send the request in the first instance to <a href="mailto:dataprotection@mourant.com">dataprotection@mourant.com</a> or utilise the <a href="mailto:Manage Your Data">Manage Your Data</a> tool provided on the Workday candidate home.

### **Mourant Group Entities**

Full details of all Mourant Group entities are included on the Legal and Regulatory Notice and Disclaimer section of our website.

Mourant Group Limited is the ultimate data controller for Mourant. In addition, the below table lists the primary entities within Mourant who may process your personal data in connection with this Privacy Notice. Each of these entities are, where required, registered as a data controller (and in some cases a data processor) in the listed jurisdictions. Any complaint may be brought to the attention of the relevant Data Protection Authority.

Entity	Jurisdiction	Data Protection Authority
Mourant Services (BVI) Limited	British Virgin Islands	Office of the Information Commissioner
		Currently subject to appointment.
Mourant Cayman Limited	Cayman Islands	Office of the Ombudsman
		5th Floor, Anderson Square 64 Shedden Road PO Box 2252 George Town Grand Cayman KYI-1107 Cayman Islands info@ombudsman.ky
Mourant Services (Guernsey) Limited	Guernsey	The Office of the Data Protection Authority
		Block A Lefebvre Court Lefebvre Street St Peter Port GY1 2JP +44 (0) 1481 742074 info@odpa.gg
Mourant Services (Hong Kong) Limited	Hong Kong	Office of the Privacy Commissioner for Personal Data
		Room 1303, 13/F, Sunlight Tower, 248 Queen's Road East, Wanchai, Hong Kong 2827 2827 complaints@pcpd.org.hk
Mourant Services (Jersey) Limited	Jersey	Jersey Office of the Information Commissioner
		2nd Floor 5 Castle Street St. Helier Jersey JE2 3BT +44 (0) 1534 716530 enquiries@jerseyoic.org
Mourant Governance Services (Luxembourg) S.à r.l.	Luxembourg	Commission Nationale pour la Protection des Données
Or  MourantGS Services (Luxembourg) S.à r.l.		15, Boulevard du Jazz L04370 Belvaux Luxembourg Grand Duchy of Luxembourg +(352) 26 10 60-1

For vacancies within Governance Services. Further details on the relevant entity will be set out in the job description for the role.		https://cnpd.public.lu/
Mourant Ozannes (Luxembourg) S.à r.l.	Luxembourg	Commission Nationale pour la Protection des Données
For vacancies within Legal Services.		15, Boulevard du Jazz L04370 Belvaux Luxembourg Grand Duchy of Luxembourg +(352) 26 10 60-1 https://cnpd.public.lu/
Mourant Global Solutions Limited	Mauritius	Data Protection Office  Level 5, SICOM Tower  Wall Street Ebene Cyber City Ebene Republic of Mauritius 460 02 51 dpo@govmu.org
Mourant Governance Services (Singapore) Pte. Ltd  For vacancies within Governance Services.	Singapore	Personal Data Protection Commission  10 Pasir Panjang Road #03-01 Mapletree Business City Singapore 117438 +65 6377 3131 https://www.pdpc.gov.sg/
Mourant Ozannes (Singapore) LLP  For vacancies within Legal Services.	Singapore	Personal Data Protection Commission  10 Pasir Panjang Road #03-01 Mapletree Business City Singapore 117438 +65 6377 3131 https://www.pdpc.gov.sg/
Mourant Services (UK) Limited	United Kingdom	Information Commissioner's Office  Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF 0303 123 1113 privacy@hmtreasury.gov.uk

### **Contact Details**

All enquiries in respect of this Privacy Notice or any request to exercise any of the rights set out above should be directed to the relevant Data Protection Officer, as follows:

Entity/ies	DPO email address	DPO postal address
All entities listed in this	dataprotection@mourant.com	Data Protection Officer
Privacy Notice other than those entities listed below		Mourant Ozannes
those critices listed below		22 Grenville Street
		St Helier
		Jersey JE4 8PX
		Channel Islands
Mourant Global Solutions Limited	Will.morgan@mourant.com	Data Protection Officer
		Mourant Global Solutions Limited
		Office 14-17, 2 <sup>nd</sup> Floor, Block 2,
		The Strand, Lakeside District Beau Plan 21001, Mauritius
		beau Plaii 21001, Mauritius
Mourant Ozannes	dataprotection@mourant.com*	Mourant Ozannes (Luxembourg)
(Luxembourg) S.à r.l.		S.à r.l.
		4 avenue Jean-Pierre Pescatore L-2324 Luxembourg
		Grand Duchy of Luxembourg
Mourant Governance	info@mourant.lu*	Mourant Governance Services
Services (Luxembourg)		(Luxembourg) S.à r.l.
S.à r.l.		10 mas Mishal Dadanas
		18, rue Michel Rodange L-2430, Luxembourg
		Grand Duchy of Luxembourg
		Grand Buchy of Educiniboding
MourantGS Services	dataprotection@mourant.com*	MourantGS Services (Luxembourg)
(Luxembourg) S.à r.l.		S.à r.l.
		20 mas Mishal Dadanas
		20, rue Michel Rodange L-2430, Luxembourg
		Grand Duchy of Luxembourg
		C.aa Ladii, or Laxenibourg

<sup>\*</sup>Mourant Ozannes (Luxembourg) S.à r.l., Mourant Governance Services (Luxembourg) S.à r.l., and MourantGS Services (Luxembourg) S.à r.l. have not appointed a data protection officer. All enquiries to these email addresses will be directed to the board of managers (gérants) of the relevant company.

## **EU Representative**

To the extent that the Mourant Group entity processing your data falls within the territorial scope of GDPR and is not established within the European Union (**EU**), then that entity has appointed Mourant Ozannes (Luxembourg) S.à r.l. as its EU Representative. Its address is 4 avenue Jean-Pierre Pescatore, L-2324 Luxembourg, Grand Duchy of Luxembourg.

## **UK Representative**

To the extent that the Mourant Group entity processing your data falls within the territorial scope of the United Kingdom's Data Protection Act 2017 and is not established within the United Kingdom ( $\mathbf{UK}$ ), then that entity has appointed Mourant Services (UK) Limited as its UK Representative. Its address is  $10^{th}$  Floor, 110 Cannon Street, London, EC4N 6EU.

# **Changes to this Privacy Notice**

We keep this Privacy Notice under review and any updates will appear on our website at www.mourant.com.

We last updated this Privacy Notice on 1 August 2025.