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## MOURANT GROUP – RECRUITMENT PRIVACY NOTICE

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## General

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

In this Privacy Notice, "**Data Protection Legislation**" means all applicable 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**), the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018, the Data Protection (Jersey) Law 2018, the Data Protection (Bailiwick of Guernsey) Law 2017, the Mauritius Data Protection Act 2017, the British Virgin Islands Data Protection Act, 2021, the Cayman Islands Data Protection Act (2021 Revision), 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 can be directed to [recruitment@mourant.com](mailto:recruitment@mourant.com) or [dataprotection@mourant.com](mailto:dataprotection@mourant.com).

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, or, if different, the Mourant entity that would employ or engage you. The relevant Mourant entity will usually be identified in the job advertisement, and your recruitment contact can confirm it on request. Under certain circumstances other entities in the Mourant Group may also be considered data controllers in respect to your personal data, but the leading entity for the recruitment vacancy will be your primary data controller and the one with overarching responsibility to you as a data controller.

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](#).

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## The personal data we collect directly 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, qualifications, experience and any other information relating to your employment history, skills and experience that you provide to us. If you progress to later stages of the recruitment process, we may also collect your date of birth, nationality, right to work documentation, details of your referees and, where applicable, information needed for pre-employment screening. In addition, if you contact us, we may keep a record of that correspondence and we keep details of your visits to our [Careers](#) webpage including, but not limited to, traffic data, location data and other communication data, the site that referred you to our Careers webpage and the resources that you access. This Privacy Notice should be read alongside our [Cookie Policy](#).

## 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 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 identify you in this way, we will obtain your personal data from these sources, and we will provide you with this Privacy Notice when we first contact you.

We may also receive personal data about you from recruitment agents, your referees, pre-employment screening providers (where applicable) 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 Maurant, 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.

We will collect your data only where we are legally permitted to do so, and only to the extent it is appropriate and necessary for one or more of the purposes described below.

| Lawful basis                                                                                              | Purpose                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To take necessary steps at your request prior to entering into a contract with you<br>( <b>Contract</b> ) | <ul style="list-style-type: none"> <li>Assessing qualifications for a particular role or project</li> <li>Making a decision about your recruitment or appointment</li> <li>Determining the terms and conditions on which you will work for us</li> <li>Responding to your requests and enquiries and otherwise communicating with you or your representatives</li> </ul> |

|                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Where you have given consent to process your data for specific purposes <b>(Consent)</b>                                                                                     | <ul style="list-style-type: none"> <li>At recruitment events, certain types of promotional photography and filming that require consent</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Necessary to comply with a legal obligation <b>(Legal Obligation)</b>                                                                                                        | <ul style="list-style-type: none"> <li>To comply with our legal and regulatory obligations</li> <li>Checking that you are legally entitled to work in the relevant jurisdiction and complying with social security, immigration, data protection, equality and health and safety obligations</li> <li>To identify and manage any potential or actual conflict of interest</li> <li>To investigate and resolve any complaints you may raise</li> <li>Compliance with applicable laws and regulations and/or legitimate orders of a court, law enforcement authority, government, supervisory, regulatory or tax authority</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Necessary for our legitimate interests, or those of a third party, where your interests and fundamental rights do not override those interests <b>(Legitimate Interests)</b> | <ul style="list-style-type: none"> <li>Business management, administration and planning, including auditing and compliance with our internal policies and procedures</li> <li>Identifying and contacting potential candidates for current and future job openings, and considering your application for other roles within Mourant</li> <li>Verifying the information you provide and carrying out pre-employment screening, including obtaining references</li> <li>Dealing with legal disputes involving you before any relevant court, supervisory or regulatory authority</li> <li>Establishing, exercising, or defending legal claims</li> <li>Equal opportunities monitoring (<i>also relies on a substantial public interest condition</i>)</li> <li>Day-to-day administration of the recruitment process, for example scheduling interviews and meetings, and maintaining the security of our information and communication systems</li> <li>To conduct data analytics studies and candidate surveys to review, better understand and/or improve candidate experience</li> </ul> |

|                                                                                |                                                                                                                                                                                        |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                | <ul style="list-style-type: none"> <li>Recording of recruitment events you attend and/or certain types of promotional photography and filming where consent is not required</li> </ul> |
| To protect your, or someone else's, vital interests ( <b>Vital Interests</b> ) | <ul style="list-style-type: none"> <li>For safeguarding purposes</li> <li>In the event of a medical or other emergency</li> </ul>                                                      |

In certain instances, personal data processed may include "Special Category Data" (which could include information on a person's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data processed for the purpose of uniquely identifying a natural person, health data, or data on a person's sex life or sexual orientation), and "data relating to criminal records" or alleged criminal activity (some of our regulators identify this as being distinct from special category data). In the recruitment context, this may include information about your health or any disability (for example, so that we can make reasonable adjustments to the recruitment process), equal opportunities monitoring information that you choose to provide and, where applicable and permitted by law, the results of criminal record checks. We will only process this data where an additional condition under the Data Protection Legislation applies, for example where the processing is necessary to comply with our obligations or exercise our rights in the field of employment law, for reasons of substantial public interest (such as equal opportunities monitoring or meeting our regulatory obligations), for the establishment, exercise or defence of legal claims, or where you have given your explicit consent. This data is of higher sensitivity, and we apply a high standard of technical and organisational measures to protect it.

You are not obliged to provide your personal data to us. However, if you do not provide information that we need to assess your application, or to carry out checks required by law, we may not be able to progress your application.

### **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. Where a decision that has legal or similarly significant effects for you is based solely on automated processing, you have the right to request human review of that decision, to express your point of view and to contest the decision.

### **How we share your personal data**

An Intra Group Data Processing Agreement is in place to facilitate and control the sharing of personal data between Maurant Group entities. Because Maurant operates on a multi-jurisdictional basis, personal data may be accessed and processed by Maurant personnel in different offices in the ordinary course of providing services, including through shared systems, cross-office working and support functions. Where this occurs, the processing remains subject to Maurant's group data protection framework and applicable legal requirements.

We will only send your personal data outside the Maurant Group where we have a lawful basis for doing so. This may include sharing your personal data with recruitment agencies, your referees, pre-employment screening providers, our IT and software service providers (such as Workday), our professional advisers and, where required, regulators, courts and other public authorities. In certain instances, personal data may be shared with third parties in jurisdictions that are not recognised as providing an adequate level of data protection (for example, local agents we use to help manage your relationship with us where the job opening is in such a jurisdiction). Where we make such a transfer, including to Maurant offices in those jurisdictions, we will make sure that it is protected in a similar way by implementing appropriate safeguards in accordance with the Data Protection

Legislation. You can request further information about these safeguards by contacting [dataprotection@mourant.com](mailto:dataprotection@mourant.com). There may be limited instances where it is not possible to implement appropriate safeguards (for example, if we need to make a hotel reservation for you in such a jurisdiction). In those instances we will only transfer your personal data where the Data Protection Legislation permits it, for example where the transfer is necessary to take steps at your request before entering into a contract with you.

As with many businesses offering services like those of Mourant, we utilise third party IT platforms, including cloud-based platforms and subscription application services. Where these services are integral to our work (for example the use of Microsoft 365 and iManage (our document management system)), they 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, 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 data centre in Frankfurt (Germany).

At times we may use reputable AI technologies to assist with our recruitment process and other data processing activities. Such use is tightly governed under an AI Usage Policy that specifies AI technologies permitted for use and how they can be used, along with AI technologies that must not be used. Where AI technologies are used, they are subject to appropriate technical, organisational and governance controls designed to uphold confidentiality, security and compliance with applicable legal obligations.

## **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 security 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 that, while we take appropriate technical and organisational measures to protect your personal data, the transmission of information over the internet is not completely secure. We cannot guarantee the security of information transmitted to us electronically before it reaches our systems.

## **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 the data of unsuccessful candidates for a period of 6 months from the date on which we notify you of the outcome of your application. If your application is successful, your personal data will become part of your personnel record and will be retained in accordance with our Employee Personal Data Privacy Notice.

## **Rights of data subjects**

Individuals have certain rights in respect of their personal data.

The majority of your personal data that we process is accessible for you to view and amend through your Workday candidate account. We encourage you to inform us of any changes to your personal data as soon as possible so that we can ensure our records are accurate and up to date.

Depending on where you are located and the circumstances, you may have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request").

This enables you to receive a confirmation that your personal data is being processed by us, to receive certain information about the processing, to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing** of your personal data where there is something about your particular situation that makes you want to object to the processing. The right to object only applies in certain circumstances, depending on the purpose and lawful basis of the processing.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend certain processing of personal data about you, for example if you want to establish its accuracy or the reason for processing it.
- **Ask for transfer** of your personal data to another party (also known as "the right to data portability").
- **Withdraw your consent** at any time where we rely on your consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Request human review** of any decision that was based solely on automated processing with legal or similarly significant effects.
- **Make a complaint** to us, or to a data protection supervisory authority (see below), if you have concerns about our processing of your data, or how we have handled a data protection query or request.

Anyone wishing to exercise any of the above rights can use the Manage Your Data tool provided on the Workday candidate home page, share the request with their Maurant recruitment contact or contact our Global Data Protection Officer at [dataprotection@maurant.com](mailto:dataprotection@maurant.com).

### Maurant Group Entities

Full details of all Maurant Group entities are included on the [Legal and Regulatory Notice and Disclaimer](#) section of our website.

Maurant Group Limited is the coordinating entity for data protection governance across the Maurant Group. Operating entities within the Maurant Group are, where required, registered as a data controller (and in some cases a data processor) in their respective jurisdictions.

### Data Protection Officer and data protection supervisory authorities

The Maurant Group has a Global Data Protection Officer. Any enquiries in respect of the protection of your personal data can be directed to:

| Entity                                                                   | Contact Details                                                            |                                                                                                                            |
|--------------------------------------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| All entities<br><b>excluding</b> Maurant Fund Services (Luxembourg) SARL | <a href="mailto:dataprotection@maurant.com">dataprotection@maurant.com</a> | Global Data Protection Officer<br>Maurant Group<br>22 Grenville Street<br>St. Helier<br>Jersey, JE4 8PX<br>Channel Islands |
| Maurant Fund Services (Luxembourg) SARL                                  | <a href="mailto:info@maurant.lu">info@maurant.lu</a>                       | Data Protection Officer<br>Maurant Fund Services (Luxembourg) SARL<br>6, rue Jean Monnet                                   |

|  |  |                                                |
|--|--|------------------------------------------------|
|  |  | L-2180 Luxembourg<br>Grand Duchy of Luxembourg |
|--|--|------------------------------------------------|

We encourage you to contact us first so that we can try to resolve any concerns. However, you may make a complaint at any time to a data protection supervisory authority, which may include the authority in the jurisdiction where you live or work, or where you consider that an infringement has taken place. Please see below for jurisdictional contact details.

| <b>Data Protection Supervisory Authority</b> | <b>Contact Details</b>                                                                                                             |                                                                                                                                                               |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>British Virgin Islands</b>                | <a href="mailto:customerservice@gov.vg">customerservice@gov.vg</a><br>1 (284) 468-3701                                             | Office of the Information Commissioner<br>33 Admin Drive<br>Wickhams Cay 1<br>Road Town<br>Tortola<br>British Virgin Islands                                  |
| <b>Cayman Islands</b>                        | <a href="https://ombudsman.ky/make-a-complaint">https://ombudsman.ky/make-a-complaint</a><br>+1 345 946 6283                       | Office of the Ombudsman<br>5 <sup>th</sup> Floor, Anderson Square<br>64 Shedden Road<br>George Town<br>Grand Cayman KY1-1107<br>PO Box 2252<br>Cayman Islands |
| <b>Guernsey</b>                              | <a href="https://www.odpa.gg/individuals/make-complaint">https://www.odpa.gg/individuals/make-complaint</a><br>+44 (0) 1481 742074 | The Office of the Data Protection Authority<br>Block A<br>Lefebvre Court<br>Lefebvre Street<br>St Peter Port<br>GY1 2JP                                       |
| <b>Hong Kong</b>                             | <a href="mailto:complaints@pcpd.org.hk">complaints@pcpd.org.hk</a><br>+852 2827 2827                                               | Office of the Privacy Commissioner for Personal Data<br>Unit 1303, 13/F, Dah Sing Financial Centre,<br>248 Queen's Road East<br>Wanchai<br>Hong Kong          |
| <b>Jersey</b>                                | <a href="https://jerseyoic.org/raise-a-concern">https://jerseyoic.org/raise-a-concern</a><br>+44 (0) 1534 716530                   | Jersey Office of the Information Commissioner<br>2nd Floor<br>5 Castle Street<br>St. Helier<br>Jersey<br>JE2 3BT                                              |
| <b>Grand Duchy of Luxembourg</b>             | <a href="https://cnpd.public.lu/en/particuliers/faire-valoir">https://cnpd.public.lu/en/particuliers/faire-valoir</a>              | National Commission for Data Protection                                                                                                                       |

|                  |                                                                                                                                                                                                    |                                                                                                                                                                         |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | +352 26 10 60-1                                                                                                                                                                                    | (Commission Nationale pour la Protection des Données)<br>Service des réclamations<br>15, Boulevard du Jazz<br>L-4370 Belvaux<br>Luxembourg<br>Grand Duchy of Luxembourg |
| <b>Mauritius</b> | dpo@govmu.org<br><br>+230 460 0251                                                                                                                                                                 | Data Protection Office<br>Level 5, SICOM Tower<br>Wall Street<br>Ebene Cyber City<br>Ebene<br>Republic of Mauritius                                                     |
| <b>Singapore</b> | <a href="https://www.pdpc.gov.sg/individuals/e-services/report-a-data-protection-concern">https://www.pdpc.gov.sg/individuals/e-services/report-a-data-protection-concern</a><br><br>+65 6377 3131 | Personal Data Protection Commission<br>10 Pasir Panjang Road<br>#03-01 Mapletree Business City<br>Singapore 117438                                                      |
| <b>UK</b>        | <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a><br><br>+44 (0) 303 123 1113                                                                                | Information Commission's Office<br>4th Floor, No.3 Circle Square<br>5 Hawkshaw Street<br>Manchester<br>M1 7BL                                                           |

### EU Representative

To the extent that the Maurant 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 Maurant Ozannes (Luxembourg) SARL as its EU Representative. Its address is 6, rue Jean Monnet, L-2180 Luxembourg, Grand Duchy of Luxembourg.

### UK Representative

To the extent that the Maurant Group entity processing your data falls within the territorial scope of the UK GDPR and is not established within the United Kingdom (**UK**), then that entity has appointed Maurant Services (UK) Limited as its UK Representative. Its address is 10<sup>th</sup> 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.maurant.com](http://www.maurant.com).

We last updated this Privacy Notice on **16 October 2026**.