

WILLIAM FRY

JOB APPLICATION/RECRUITMENT DATA PROTECTION NOTICE

1. PURPOSE AND SCOPE OF NOTICE

This notice is intended to explain how your Personal Data will be handled by William Fry and sets out the information including the personal information detailed below relating to you ("**Personal Data**") that will be collected and processed by William Fry where:

- You participate in a William Fry recruitment initiative;
- You voluntarily submit an employment application to a representative of William Fry on an ad hoc basis;
- You register onto the William Fry online recruitment system;
- You apply for a speculative or advertised role within William Fry (whether as an employee or non-employee of William Fry);
- A recruiter provides your Personal Data to William Fry for employment consideration purposes.

William Fry is responsible for your Personal Data. William Fry comprises the partnership known as William Fry constituted under the laws of Ireland (with offices in Dublin, London, New York, Silicon Valley and San Francisco) and any entities owned or controlled by it (or by some or all of its partners) in connection with its business, including Frymount Limited, William Fry Tax Advisors Limited and Wilton Secretarial Limited (the "William Fry Companies"). References in this notice to "**William Fry**", "**the Firm**", "**we**", "**our**" or "**us**" include the William Fry Companies and the international offices.

This notice applies to any and all job applications submitted and recruitment initiatives co-ordinated by William Fry. If you have any questions or concerns about this notice, please contact us at DPqueries@williamfry.com.

IMPORTANT: where we receive your CV via a third party recruitment agency or a third level education institution (together "**Recruiter**"), we encourage you to read the relevant Recruiter's data protection notice to understand how your Personal Data is processed by such a Recruiter who is a controller of your Personal Data independently of William Fry.

2. APPLICATION OF THIS NOTICE

This notice applies to the way we collect and process your Personal Data from the time such data is provided to William Fry by you or a Recruiter on your behalf for employment consideration purposes up to the point at which retention is no longer relevant as outlined in section 7 of this notice or the point at which you commence employment with us (if applicable). Once you commence employment with William Fry, the way we process your Personal Data will no longer be dealt with under this notice, but will instead be governed by our Employee Data Protection Notice (which will be made available to you when you commence your employment with William Fry).

3. WHAT PERSONAL DATA WE PROCESS

As part of the recruitment and job application process, we will collect your Personal Data which may include:

- Personal details such as your name, gender, postal address, email address, contact telephone numbers, nationality, marital status, country of birth;
- Details about your employment history such as the name and address of your previous employer(s), roles you have held, the date and length of your service;
- Details about your qualifications such as your skills, education, certifications/qualifications, professional memberships, professional achievements, the languages you speak (including your

proficiency), your eligibility to work in a particular country (e.g. your nationality, residency, citizenship or visa details), your relevant experience;

- Details about your aspirations/preferences such as positions you may be interested in, information about when you may be available to interview and/or start work with William Fry (i.e. your current notice period), information regarding your current or desired pay/benefit arrangements, information you provide regarding your suitability for employment;
- Your photograph (if you apply for a high-volume application role such as an internship or traineeship, you will have the option of providing a photograph which helps us to identify you during the recruitment process);
- Details of any special assistance/support you would require if called for interview;
- Your image on CCTV in common areas at 2 Grand Canal Square (where you attend our offices at any stage during the recruitment process);
- Details you may provide us in response to our queries or questions at interview stage (including information about you which we generate throughout the interview and/or recruitment process); and
- Details about you which we gather from publically available sources such as the Law Society of Ireland Law Directory.

It is necessary for us to process your Personal Data in order to assess your job application and/or include you in a recruitment initiative. Ultimately, it may also be necessary for us to process your Personal Data in order to take steps to offer and enter into a contract of employment with you. In the event that you do not wish to provide us with your Personal Data for the purposes outlined in this notice, we will not be able to assess your job application and/or include you in a recruitment initiative and/or offer you a contract of employment.

While you may choose to send us additional information (such as cover letters, references, academic transcripts) to support your application, we ask you not to send sensitive personal information. William Fry is an equal opportunity employer and does not discriminate, either directly or indirectly, on the grounds of gender, family or marital/civil status, age, disability, sexual orientation, religion, race or membership of the travelling community.

Please note that, should you include additional information that is likely to contain your Personal Data, we will hold and process any such Personal Data in accordance with the terms of this notice.

4. WHY WE PROCESS YOUR PERSONAL DATA

The following table details the key context for which ("**Legal Basis**") and why ("**Purposes**") we collect, obtain and process your Personal Data within William Fry.

LEGITIMATE INTERESTS	
Legal Basis	We may obtain, collect and process your Personal Data where it is necessary for the purpose of facilitating the recruitment process.
Purposes	<p>We obtain, collect and process your Personal Data:</p> <ul style="list-style-type: none"> • To process your job application, including to contact you in relation to interviews, make appropriate interview arrangements and/or offer you a job after the interview stage; • To assess your skills, qualifications and aptitude against vacancies in William Fry which may be suitable for you; • To verify details you have provided to us using third party sources; • To request information from third parties (such as references from previous employers and confirmation of qualifications and/or memberships); • To maximise the number of potential candidates who are informed

	<p>about job opportunities;</p> <ul style="list-style-type: none"> • To contact you about future vacancies/roles with William Fry which we think you may be interested in; • To comply with recruitment agency terms and condition to which we may be subject; and • To collect feedback on and evaluate the recruitment process.
IMPORTANT	When we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You have a right to object at any time to the processing of your Personal Data.

COMPLIANCE WITH A LEGAL OBLIGATION	
Legal Basis	It is necessary to process your Personal Data in order to comply with legal obligations imposed on us as an employer under applicable Irish and European Union law.
Purposes	<p>We obtain, collect and process your Personal Data in order to comply with the following legal obligations:</p> <ul style="list-style-type: none"> • To comply with Irish and European Union employment, equality and health & safety law; • To comply with Irish and European Union tax law; and • To comply with other applicable Irish and European Union laws.

ASSESSMENT OF YOUR WORKING CAPACITY	
Legal Basis	It is necessary to process your Personal Data in order for us to determine your working capacity.
Purposes	<p>We obtain, collect and process your Personal Data:</p> <ul style="list-style-type: none"> • To assess if you are fit to work or not fit to work (e.g. where you suffer from a health condition which may affect your working capacity); • To provide you with adequate support at interview stage (e.g. if you have a health condition which may affect your ability to attend for interview).

DEFEND, ESTABLISH OR BE A PARTY IN LEGAL CLAIMS	
Legal Basis	It might be necessary to process your Personal Data in order for us to establish, investigate, exercise or defend legal claim.
Purposes	<p>We obtain, collect and process your Personal Data:</p> <ul style="list-style-type: none"> • To file legal proceedings; • To investigate, establish, exercise or defend a legal claim (e.g. potential employment equality claims which you or a Recruiter may bring against us); and • To settle legal claims.

We will only use your Personal Data for the purposes for which we collect it (as outlined in this section 4), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you in accordance with section 11 of this notice and we will explain the legal basis which allows us to do so.

5. DISCLOSURE OF YOUR PERSONAL DATA

We may disclose some or all of your Personal Data to the following parties:

- The HR team in William Fry who are primarily responsible for recruitment matters;
- Individuals within William Fry (typically Partners, Managers, Consultants and Senior Associates) who are involved in recruitment matters such as screening applications and/or interviewing candidates;
- Your previous employer(s) (where you have listed them as your reference(s));
- Recruiters (where your application is being handled by a Recruiter);
- Outsourced service providers who assist William Fry with recruitment initiatives and campaigns;
- Third Party service providers such as those who support the Firm's electronic recruitment system; and
- Professional advisors such as legal advisors, consultants and accountants.

6. TRANSFER OF YOUR PERSONAL DATA

We may transfer your Personal Data outside the European Economic Area ("**EEA**"), for example, within the William Fry Companies and to other recipients. Certain recipients (some of our third party service providers and certain William Fry Companies) who process your Personal Data on our behalf may transfer your Personal Data outside the EEA to a country that does not provide an adequate level of protection to your Personal Data. Where such transfers occur, it is our policy that: a) they do not occur without our prior written authority; and b) that an appropriate transfer agreement such as the Standard Contractual Clauses or other approved transfer mechanisms approved by the European Commission and supervisory authorities (such as the Data Protection Commission) is put in place to protect your Personal Data. If you would like to find out more about any such transfers, please e-mail DPqueries@williamfry.com.

7. RETENTION OF YOUR PERSONAL DATA

Where you are a **successful job applicant**, the Personal Data generated by us and provided by you over the course of the job application/recruitment process will be retained by us for the purpose of your contract of employment. Such Personal Data will be retained in accordance with our Employee Data Protection Notice (which will be available to you when you commence employment).

Where you are an **unsuccessful job applicant**, we will retain your Personal Data for a period of up to **18 months** from the most recent of the following events:

- You register online as a candidate or a Recruiter registers your details with us;
- You log onto your profile on the William Fry recruitment system;
- Either you or a Recruiter on your behalf submit or withdraw an application;
- We advise you or a Recruiter on your behalf that your application has been unsuccessful; or
- You decline our offer of employment.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

8. YOUR RESPONSIBILITIES

It is your responsibility to ensure that the Personal Data and information you provide to us is true and complete; any omissions or false information may result in the withdrawal of any offer of employment made to you or, if you have been hired, disciplinary action up to and including dismissal.

9. YOUR RIGHTS AND HOW TO EXERCISE THEM

You have a number of rights in relation to your Personal Data, which are set out in this section 9. **In particular, these rights include the right to object to processing of your Personal Data where that processing is carried out for our legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right of Access	You have the right to request a copy of the Personal Data held by us about you and to access the information which we hold about you. We will charge you for making such an access request where we feel your request is unjustified or excessive.
Right to Rectification	You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see below) and we do not have an overriding reason to process your Personal Data or if we no longer require your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask us to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data we hold about you is inaccurate or our use of your information is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Object	You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.

You can exercise any of these rights by e-mailing DPQueries@williamfry.com.

If you applied directly via our online recruitment system you can, at any time, log in and review/update your Personal Data, withdraw any application(s) you have submitted or delete all your Personal Data.

10. QUESTIONS REGARDING THIS NOTICE

If you have any concerns about the way your Personal Data is being used or processed by William Fry, please e-mail DPQueries@williamfry.com.

If after this, you are not satisfied by the effort and response by William Fry, you have the right to lodge a complaint with the Data Protection Commission. Please see www.dataprotection.ie for further information.

11. CHANGES TO THIS NOTICE

If we amend this notice, in whole or part, at our sole discretion, any changes will be effective immediately upon notifying the revised notice to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you and you will have a choice as to whether or not we use your Personal Data in the new manner.

If you have questions or concerns about this notice, please e-mail DPQueries@williamfry.com.

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