

## **NatureWorks BV Applicant Privacy Notice**

NatureWorks BV (“**NatureWorks**” or “**we**” or “**our**” or “**us**”) is committed to protecting the privacy and security of your personal data.

As part of our recruitment process, NatureWorks collects and processes personal data relating to job applicants. NatureWorks is committed to being transparent about how it collects and uses that data in keeping with data protection principles. This Privacy Notice describes how we collect and use personal data about you during the recruitment process in accordance with the General Data Protection Regulation (“**GDPR**”) and applicable local law.

Nothing in this Privacy Notice shall be deemed to constitute a contract of employment or a contract for services nor shall it form part of any potential subsequent contract of employment or contract for services that you may be offered. We may amend this Privacy Notice at any time as permitted by applicable law and will notify you of any material changes.

Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal data about you.

### **Data Controller**

NatureWorks is a “data controller”. This means that we are responsible for deciding how we hold and use personal data about you. The information in this Privacy Notice is also used by our affiliated entities and group companies. References to ‘NatureWorks, ‘we’ or ‘us’ means NatureWorks BV and/or the relevant group company.

### **Data Protection Principles**

NatureWorks processes your personal data in accordance with the GDPR’s data protection principles:

- We process your personal data lawfully, fairly and in a transparent manner.
- We collect your personal data only for specified, explicit and legitimate purposes.
- We process your personal data only where it is adequate, relevant and limited to what is necessary for our purposes.
- We keep your personal data accurate and up to date.
- We keep your personal data only for the period necessary for our processing purposes.
- We process your personal data in a manner that ensures appropriate security.

### **Information We Collect**

In connection with your application to work with us, we will collect, store, and use the following categories of personal data about you:

- The information you have provided to us in your curriculum vitae, covering letter and other communications with us.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, referees, disability status.

- Any information you provide to us during an interview.

We may also collect, store and use the following types of more sensitive personal data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### **Information about Criminal Convictions**

We envisage that we will hold information regarding criminal convictions. We only use information relating to criminal convictions where the law allows us to do so and if it is appropriate given the nature of the role. This will usually be where such processing is necessary to carry out our obligations as an employer. Less commonly, we may use your criminal convictions data where it is necessary for legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving consent, or where you have already made the information public. Where appropriate, we will collect criminal conviction data as part of the recruitment process, or we may be notified of such information directly by you during your application.

### **How We Collect your Information**

We collect personal data about applicants from the following sources:

- You, the applicant.
- Any recruitment agency we have engaged.
- Background check providers.
- Credit reference agencies.
- Criminal record check bureaus in the relevant local jurisdiction.
- Your named referees.

### **Why We Collect your Information**

We use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.

- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We do not envisage that any decisions will be taken about you using solely automated means, however we will notify you in writing if this position changes.

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role. We also need to process your personal data to decide whether to enter into a contract of employment with you.

Having received your application, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out a criminal record and any other required or prudent checks before confirming your appointment.

We will use your sensitive personal data in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

### **Sharing your Information**

We will only share your personal data with the following third parties for the purposes of processing your application:

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal data 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.

NatureWorks may also disclose your personal data as required or permitted by applicable law to law enforcement agencies, governmental or regulatory authorities, and court/tribunal authorities.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

### **Data Retention**

We will retain your personal data for a period of 12 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal data for that period so that

we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal data in accordance with our data retention policy and applicable laws and regulations.

### **International Data Transfers**

We share your personal data within the NatureWorks group of companies, which involves transferring your data outside the European Economic Area (“**EEA**”) to the United States . Many of our external third-parties are also based outside the EEA.

NatureWorks takes all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- We may use specific contracts approved by the European Commission which give personal data the same protection it has inside the EEA; or
- Where your personal data is transferred to the USA, we may transfer data to recipients where they are certified to the Privacy Shield which requires them to provide similar protection to personal data as if it was processed inside the EEA.

Please contact us as set out in **Contact Us** below if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### **Your Rights**

Subject to any exceptions or derogations under national data protection law, you have the following rights in relation to your personal data:

1. **Right of access:** You have the right to obtain confirmation as to whether your Personal data is processed and to request access to your personal data.
2. **Right to rectification:** You have the right to have any inaccurate personal data we hold about you corrected.
3. **Right to erasure (right to be forgotten):** This enables you, in certain circumstances, to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. **Right to restriction of processing:** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the personal data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

5. **Right to data portability:** This enables you to request the transfer of your personal data to you or to a third party in a structured, commonly used, machine-readable format. Note that this right only applies to automated personal data which you initially provided consent for us to use or where we used the personal data to perform a contract with you.
6. **Right to object:** This enables you to object to processing of your personal data where we rely on a legitimate interest, but you consider a particular type of processing impacts your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.

You also have the right to make a complaint at any time to your local supervisory authority for data protection issues. However, we would appreciate the opportunity to address your complaint in the first instance.

### **Exercising your Rights**

To exercise your rights, please contact us as set out in the “**Contact Us**” section below.

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

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

### **Contact Us**

If you have any questions about this Privacy Notice, please contact NatureWorks’ VP, Human Resources at 952-562-3356 .

### **Acknowledgement**

I acknowledge that I have received a copy of NatureWorks’s Applicant Privacy Notice and that I have read and understood it.

Signature:

Name:

Date: