

Privacy Notice to External Users – EMEA: Talent Acquisition

Policy Owner: Global Human Resources

Last Updated: May 2018

Policy Effective Date

May 2018

Notice Statement

State Street Bank and Trust Company, its parent and its affiliates (collectively, “State Street”) respect your privacy. This Privacy Notice explains how State Street handles your personal data. It describes the types of personal data about you that we may collect, how we may process that data, who we may share it with and how we protect it.

Additional Information for Individuals Working in Europe

State Street acts as a “data controller” in relation to your personal data, which is defined as “any information relating to an identified or identifiable natural person” This means that State Street is responsible for deciding how we hold and use personal information about you. We are required under applicable data protection legislation to notify you of the information contained in this Privacy Notice.

Scope

This Privacy Notice applies to people applying for jobs at State Street.



Notice Details

Please read this Privacy Notice carefully. Your use of State Street's systems to apply for jobs is subject to and governed by this Privacy Notice.

I. **Types of Personal Data We May Collect**

Personal data is information that relates to an identified or identifiable individual. The types of personal data we collect in the recruitment process include but are not limited to:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependents.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Copy of driving license, national id, passport and/or travel visa(s).
- Copies of right to work documentation
- References
- Information included in your CV/resume or cover letter or as part of the application process.
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- Compensation history.
- Information about your use of our information and communications systems.
- Business travel activity, related expenses and taxes.

Special Categories of Personal Data

Certain countries have enacted laws that require higher protection of certain special categories of sensitive personal data. The definition of sensitive personal data is not always the same in each country. In Europe, the following types of information which we may collect, store and use, would be classified as sensitive personal data: Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.

- Trade union membership.
- Information about your health, including any medical condition, health and sickness records, including:
- Information about criminal convictions and offences, to the extent permissible under local law.

State Street obtains and processes sensitive data only when required and allowed by applicable laws.

For more information on personal data, please reference the [Global Privacy and Personal Data Security Policy and Program](#), and any applicable addenda thereto.

II. How We Collect Personal Data

State Street may collect information from you during the recruitment and on-boarding process as well as on a regular basis in the course of your relationship with State Street, for example, through means such as or web-based interfaces, or paper-based forms. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

In some jurisdictions State Street is required by law to ask you about your race, ethnicity, and other aspects of your personal identity. If you wish to do so, you may respond to these surveys but are not required to do so.

By providing State Street with information about your related persons (e.g., spouses, domestic partners, eligible children, personal contacts, etc. et. al.), you acknowledge that you have informed them of the processing of their data by State Street and that you have the authority to provide this information to State Street.

Cookies and IP Addresses

State Street may collect certain information by automated means when you visit our intranet or our web-based interfaces, such as how many users visited these sites and the pages accessed. We collect this information through “cookies” and IP addresses.

Cookies

Information Classification: General

Like many organizations, we use “cookies” on our intranet sites and web-based interfaces. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. We may use cookies to tell us, for example, whether you have visited any given State Street intranet site or web-based interface before or if you are a new visitor and to help us identify site features in which you may have the greatest interest. The information collected through cookies typically is stored only for the length of time that you are connected to the relevant site. Certain information, however, may in some instances be stored in a cookie that lasts longer than the duration of the visit to the site.

The use of cookies is common on the internet and many web browsers are initially configured to accept cookies automatically. If you would prefer not to accept cookies, you can set your web browser to notify you when your computer is receiving a cookie or to refuse cookies automatically. Note that many websites use cookies to provide a smooth user experience when navigating the site. Disabling cookies may render websites unusable. To readjust your web browser's cookie options, please refer to the instruction documentation of your particular browser, or seek online assistance.

IP Addresses

An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our websites, we may view the IP address of the device you use to connect to the Internet. We use this information to determine the general physical location of the device and to understand from what regions of the world our web visitors come.

III. How We Use Personal Data

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else’s interests).
- Where it is needed in the public interest.

IV. Situations in Which We Will Use Your Personal Information

We need all the categories of information in the list above primarily to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information include:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the country/state in which you work.
- Paying you and, if you are an employee or deemed employee for tax purposes.
- Providing benefits to you, including pension, life cover and private healthcare.
- Inviting you to participate in any share plans operated by a group company; granting awards under any share plans operated by a group company; and administering your participation in any share plans operated by a group company, including communicating with you about your participation and collecting any taxes due on any share awards.
- Enrolling you in a pension arrangement; liaising with the trustees or managers of a pension arrangement operated by a group company, your pension provider and any other provider of employee benefits.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting, auditing and business continuity.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for regulatory investigations and/or possible grievance or disciplinary hearings.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees.
- Ascertaining your fitness to work.
- Complying with health and safety obligations.
- To prevent fraud and other crimes.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.

- Equal opportunities monitoring.
- For compliance with any applicable State Street policies and Standard of Conduct, procedures, laws, and regulations (including governmental reporting).

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you fail to provide personal information

We will not be able to proceed with your application to work for State Street.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

How we use sensitive personal data

Sensitive personal data requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations as an employer

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

- We may use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments.
- We may 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.
- We may use trade union membership information to pay trade union premiums, register the status

of a protected employee and to comply with employment law obligations.

Do we need your consent?

Individuals Working In Europe

We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive personal data. If we do so, we will provide you with details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Individuals in non-European countries

By agreeing to this privacy notice, you explicitly consent and opt-in to your sensitive data being processed for the purposes set out in this privacy notice.

Information about Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our internal policies.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about current or former members of staff in the course of legitimate business activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally permitted to do so. Where appropriate and permitted under local law, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

V. How We Share Personal Data

To the extent permitted by local law, your personal data may be transferred among State Street's group companies, as well as with appropriate management, managers, and human resources personnel as permitted by law in support of State Street's business and human resources activities. State Street may also transfer personal data to third party service providers, including Cloud-based service providers who perform services on our behalf. We require third parties to respect the security of your data and to treat it in accordance with the law. If we do share your data, you can expect a similar degree of protection in respect of your personal information.

Disclosure to Regulators and Government Authorities

State Street may disclose your personal data to law enforcement authorities, other government officials or regulatory bodies if required to do so by law or legal process or to enforce any rights State Street may have against you.

When your Personal Data is Shared by Third Parties

To the extent permitted by law, State Street's third party service providers may disclose your personal data to other third parties when required to do so for business operation or by local laws, for example, in the following situations and for the following purposes:

- to governmental authorities for immigration or visa purposes;
- as a matter of law or legal process (e.g., to tax and social security authorities);
- to protect State Street's legal rights (e.g., to defend a law suit) or as part of litigation; or
- in an emergency where your health or security is endangered (e.g., a fire or natural disaster).

State Street requires its third-party service providers to agree to comply with appropriate privacy and security standards or to undertake to provide similar and appropriate levels of protection as State Street when processing personal data.

VI. How We Transfer Personal Data

State Street and its affiliates and third party service providers transfer personal data to the United

States and may transfer personal data to other countries where State Street does business, which may not have the same data protection laws and the same statutory protections for personal data as those found in the jurisdiction in which you reside. Where this is the case, State Street will seek to implement suitable safeguards before personal data is transferred to other countries in compliance with the applicable laws.

Personal data may be stored outside the country in which you reside such as on servers located in the United States. Personal data stored or processed in a foreign jurisdiction may be accessed under a lawful order made in that jurisdiction.

VII. How We Protect Personal Data

We have put in place measures to protect the security of your information. Details of these measures are available in State Street's CIS Information Security Policy – Global.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Our practices are designed to ensure that personal data is:

Information Classification: General

- Relevant to and not excessive for the purposes for which it is collected;
- Kept up-to-date, with necessary steps taken to correct or delete data that is inaccurate or incomplete if State Street becomes aware of such occurrences;
- Disposed of properly; and
- Subject to appropriate technical and organizational measures to prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage.

Equipment and Information Security

To safeguard against unauthorized access to personal data by third parties outside State Street, all electronic personal data held by State Street is maintained on information systems protected by secure network architectures that contain firewalls and intrusion detection devices. The servers holding personal data are “backed up” (i.e., recorded on separate media) on a regular basis in order to avoid any inadvertent erasure or destruction of such personal data. These servers are stored in facilities with appropriate security and fire detection and response systems.

Access Security

State Street limits access to internal systems that hold personal data to a select group of authorized users, each of whom is given access through the use of a unique identifier and password. Access to personal data is limited to such individuals for the sole purpose of performing their job duties.

VI. Your Rights

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your application process.

Your rights in connection with personal information

In Europe in certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information

Where 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information

This enables you to ask us 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.

Request the transfer of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Privacy Office at privacyoffice@statestreet.com in writing.

No fee usually required

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 if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

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. As a person who provides State Street with personal data, you may inquire as to the nature of the personal data stored at and/or processed by State Street, may request that the personal data be corrected, and may complain about the manner in which the personal data has been handled. State Street will consider each such inquiry, request, and complaint seriously, and will respond consistent with applicable legal requirements. All such requests for access, requests for correction, and complaints may be lodged by sending a request in writing to: GHR Service Center.

To help protect your privacy and provide security, State Street takes reasonable steps to verify your identity before responding to such inquiries, requests, and complaints. When State Street responds it will do so in accordance with applicable laws or regulations after your identity has been confirmed and you have clarified the specific personal data that you require. If you demonstrate that the purpose for which the personal data is being processed is no longer appropriate under applicable law, the personal data will be deleted, unless the law or applicable data retention requirements require otherwise.

Individuals located in Europe: Right to withdraw consent

In the limited circumstances where you may have provided 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 the State Street Privacy Office at privacyoffice@statestreet.com. 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.

VII. Updates to Our Privacy Notice

This Privacy Notice may be updated periodically without prior notice to you to reflect changes in our information practices. State Street will post an updated Privacy Notice on this site to notify you of any changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated.

VIII. How to Contact Us

If you have questions or comments about this Privacy Notice, or about how your personal data is processed, please contact the [Privacy Office at privacyoffice@statestreet.com](mailto:privacyoffice@statestreet.com).

IX. For individuals outside Europe: How You Consent to the Use of Your Personal Data

By providing your personal data to State Street you understand the nature, purpose and consequences of your consent and explicitly consent and opt-in to your personal data being collected, used, disclosed, stored, transferred to other jurisdictions, which may not provide the same statutory protections for personal data as those found in your jurisdiction (including - for instance - the United States), for the purposes and in the way explained in this Privacy Notice.

Related Policies, Procedures and Guidance

CIS Information Security Policy – Global

Privacy and Personal Data Security Program – Global

Standard of Conduct – Global

Policy Administration

Global Human Resources is responsible for interpretation and administration of this document. Any changes to, or exceptions from, this policy require prior approval of Global Human Resources.

Review and Approvals

Global Human Resources is responsible for review, revision, and approval of this Policy. This policy is subject to review every two years, or otherwise as needed.

Last Reviewed: 18/5/2018	Last Reviewed by: Global Human Resources
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