

GQG PARTNERS APPLICANT PRIVACY NOTICE

Last Updated: April 30, 2024

The purpose of this privacy notice (“**Notice**”) is to describe how GQG Partners LLC and its parent, subsidiaries, and affiliated companies (“**GQG**,” “**we**,” “**us**,” or “**our**”) collect, use, disclose, transfer, and store (collectively, “**process**”) personal data or personal information, as defined under applicable law (“**Personal Data**”), about you in connection with our recruitment activities.

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1. SCOPE

While this Notice is intended to describe the broadest range of our processing activities globally, those activities may be more limited in some jurisdictions based on local laws. For example, the laws of a particular country may limit the types of Personal Data we can collect or the manner in which we use that information. In those instances, we adjust our internal policies and practices to reflect the requirements of local law.

For the purposes of data protection laws that apply in the European Union, the United Kingdom, and the Abu Dhabi Global Market (“**ADGM**”), GQG is the controller of your Personal Data.

2. APPLICABILITY OF OTHER POLICIES

This Notice does not cover our processing of Personal Data collected from you as a GQG client, business partner, or visitor of our websites. To learn more about GQG’s data collection practices in these cases, please read our online [Privacy Policy](#).

3. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

We collect information in connection with considering you for positions working with us. For example, we may collect:

- *Identifiers*, such as your full name, telephone number, personal email address, location, availability;
- *Characteristics of protected classifications under state or federal law*, such as age, gender, marital status, race or ethnicity, veteran status, and disability status;
- *Professional and employment-related information*, such as employment history (including whether you have previously worked for GQG), information about your professional background, your resumé, application cover letter, writing and analysis samples and any other files you choose to share with us regarding your qualifications, information you provide to us during an interview or that we collect through the recruitment process (e.g., willingness to relocate, current salary, type of employment contract, interview notes, results of any assessment);
- *Education information*, such as names and graduation dates of educational institutions;
- *Eligibility to work information*, such as citizenship, work permit, or visa application information;
- *Reference information and/or information received from background checks if you are offered a job (where applicable)*, including information provided by third parties such as past employers, educational institutions, and references;
- *Data concerning health*, such as medical conditions, health records, medication, vaccination or information related to symptoms of, or risk of exposure to, certain illnesses (e.g., contact with others who may be sick or relevant travel history);
- *Audio, visual, or similar information*, such as photos and information gathered via cameras and CCTV or telephonic recordings;
- Details of interests, preferences, and opinions relevant to our business and operations; and
- *Inferences drawn to create a profile about you as an applicant reflecting your preferences*, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Special categories of Personal Data: In certain countries, where permitted by applicable law and on a voluntary basis, we may process “special categories” of Personal Data, or “sensitive data” such as:

- Data revealing racial or ethnic origin;
- Data concerning health;
- Data concerning criminal convictions or offenses collected via background checks in accordance with applicable law; or
- Data in relation to an existing disability (e.g., grade of disability, expiry date of any disability ID card, issuing authority).

We collect this information for specific purposes, such as to accommodate a disability or illness and to comply with legal obligations relating to diversity and anti-discrimination. You are entirely free to decide whether to provide such information and your application will not be affected either way. Except as specifically requested, we ask that you avoid submitting information that may qualify as sensitive information under applicable law, including race, religion, ethnicity, nationality, age, gender identity, sexual life or sexual orientation, medical or health information, genetic or biometric data, political opinions, political party or trade union membership, and judicial data such as criminal records.

Information About Others: If you provide us with Personal Data of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing such information to us.

4. FROM WHICH SOURCES DO WE COLLECT PERSONAL DATA?

We collect Personal Data about you primarily directly from you when you interact with us, such as when you submit a job application or when we conduct a phone, video, or in-person interview. We may also receive information about you from other sources, such as from your named references, persons who referred you for a position, educational institutions, from background checks (if applicable), recruiting agencies, third party recruitment sources, and websites and publicly available sources such as your LinkedIn profile and other social media sites.

5. FOR WHICH PURPOSES DO WE USE PERSONAL DATA?

We will process Personal Data to evaluate a potential employment relationship with you and for other business purposes. Such uses include:

- Assessment of your skills, qualifications, and suitability for a role;
- Communication with you about the recruitment process;
- Verification of your information and completion of reference and/or background checks (where applicable) if we offer you a position;
- Retention of records related to our hiring processes, including a record of the name of unsuccessful applicants, the date of their application, and the reason that their application was not successful, in order to streamline future hiring processes;
- Legal and compliance purposes, such as responding to suspected fraud, security incidents, or other activity that is illegal or violates GQG's policies, protecting GQG's and others' rights and property, complying with equal opportunity monitoring and reporting obligations, exercising a legal claim, cooperating with law enforcement investigations, and complying with applicable laws, regulations, legal processes, or governmental requests;
- In connection with, or during negotiations of, any merger, acquisition, joint venture, financing, or in the event we sell any part of our business or assets (including in connection with any bankruptcy or similar proceedings);
- To provide appropriate adjustments during the recruitment process to accommodate any disabilities you might have;
- Other uses with your consent, which you may withdraw at any time; and
- Other legitimate interests, including our interests in considering candidates for current and future employment opportunities and in managing and improving our recruitment and hiring process.

We may not be able to do the things described above if we are unable to collect certain Personal Data. For example, we may not be able to assess your application or communicate with you.

If we hire you, information we collect in connection with your application will become part of your employment record and used to manage the onboarding process and for other employment-related purposes in accordance with our internal employee privacy policy, our Personnel Privacy Notice.

6. TO WHOM DO WE DISCLOSE PERSONAL DATA?

We may disclose Personal Data to:

- GQG personnel and affiliates for the purposes described above, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying;
- Third party service providers acting on GQG's behalf to perform some of the services described above. For example, we share certain information with service providers who facilitate our applicant tracking system, video interviews, travel booking and expenses, relocation support, reporting and analytics, data storage, fraud prevention, and verification/background checking services;
- Recruitment agencies working with us in relation to your recruitment as well as with our professional advisors, including accountants, auditors, lawyers, insurers, and bankers if needed;
- Third parties in connection with, or during negotiations of, any merger, acquisition, joint venture, financing, or in the event we sell any part of our business or assets (including in connection with any bankruptcy or similar proceedings);
- Third parties or public or governmental bodies to comply with our obligations, to protect the rights and property of GQG, our customers, and the public, to cooperate with law enforcement investigations, and to detect and respond to suspected illegal activity and threats to the health or safety of any person or of our systems or services; and
- Other parties with your consent, at your direction, or in accordance with applicable law.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you. GQG processes, maintains, and uses this information only in a de-identified fashion and will not attempt to re-identify such information except as permitted by law

7. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Due to the global nature of our business, to the extent permitted by applicable law, the Personal Data we collect in connection with your application process may be transferred to (including accessed in or stored in) a destination outside of the country where the Personal Data originated ("**Relevant Location**").

Where your Personal Data is transferred outside of the Relevant Location, we will make any such transfers subject to appropriate or suitable safeguards designed to protect your Personal Data in a manner that is consistent with how we would protect it in the Relevant Location. This may be done in a number of ways, for instance:

- we may transfer your Personal Data to a country that is approved by the data protection authority in the Relevant Location as offering an adequate level of protection for your Personal Data; or
- we may require the recipient of your Personal Data to agree to "model contractual clauses" approved by the data protection authority in the Relevant Location, obliging them to protect your

Personal Data.

In other circumstances the law may permit us to otherwise transfer your Personal Data outside the Relevant Location. In all cases, however, any transfer of your Personal Data will be designed to be compliant with data protection law.

You can obtain more details about the protection given to your Personal Data when it is transferred outside the Relevant Location by contacting us in accordance with the contact details below.

8. HOW LONG DO WE STORE PERSONAL DATA?

If your application for employment is unsuccessful (or you withdraw from the process or decline our offer), we will retain your information for a reasonable period of time beyond the end of the application process for the purposes described above, including complying with our legal obligations, resolving disputes, and as necessary for our legitimate interests, such as to consider you for other current and future employment opportunities at GQG. If you do not want us to contact you regarding other roles, please contact careers@ggg.com. After this period, we will securely destroy Personal Data about you in accordance with applicable laws and regulations or make it anonymous such that it cannot be associated with or tracked back to you.

If your application for employment is successful, Personal Data gathered during the recruitment process will be retained during your employment in accordance with our internal employee privacy policy and retention policies.

9. STORAGE AND SECURITY OF PERSONAL DATA

We implement measures designed to protect Personal Data, including - depending on the circumstances - electronic access controls, premises security, and network firewalls. We hold Personal Data electronically, both at our own premises and with the assistance of our service providers.

10. CALIFORNIA RESIDENTS

If you are a California resident, the California Consumer Privacy Act requires us to disclose the following information with respect to our collection and use of Personal Data.

Categories of Personal Data Collected: Over the preceding 12 months, we have collected the following categories of Personal Data: (1) identifiers, (2) characteristics of protected classifications under California or federal law, (3) professional or employment-related information, (4) education information, (5) inferences; (6) audio, visual, or similar information; (7) sensitive personal information; and (8) other information that identifies, relates to, describes, or could reasonably be linked to you. For examples of the precise data points we collect, please see the “**What Personal Data We Collect About You**” section above. We collect these categories of Personal Data from the sources described in “**From Which Sources Do We Collect Personal Data?**” section above.

Business Purposes for Collecting and Disclosing Personal Data: We collect each category of Personal Data for the business purposes in the “**For Which Purposes Do We Use Personal Data?**” section above. We do not use or disclose your sensitive personal information for purposes other than those expressly permitted by California law.

Recipients of Personal Data: In the preceding 12 months, we have disclosed the following categories of Personal Data for business purposes to the following categories of recipients:

Category of Personal Data	Categories of Recipients
Identifiers, such as your name, mailing address, and email address	Recruitment management service providers, fraud detection and security service providers
Characteristics of protected classifications under state or federal law, such as your gender	Recruitment management service providers
Professional or employment-related information, such as your resume and employment application	Recruitment management service providers, fraud detection and security service providers
Education information, names, and graduation dates of educational institutions	Recruitment management service providers, fraud detection and security service providers
Inferences	Recruitment management service providers
Audio, visual, or similar information, such as video data from CCTV	Recruitment management service providers, fraud detection and security service providers
Sensitive personal information, such as your race and data concerning health	Recruitment management service providers, government authorities, regulators, fraud detection and security service providers
Other information that identifies, relates to, describes, or could reasonably be linked to you, such as your eligibility to work information	Recruitment management service providers, government authorities, and regulators, fraud detection and security service providers

We retain Personal Data as described in the “**How Long Do We Store Personal Data?**” section above.

We do not “sell” or “share” your Personal Data as those terms are defined under California law.

Your Privacy Rights: California residents have certain rights with respect to their Personal Data, including the following:

- **Right to Access:** You may ask us to confirm whether we are processing your Personal Data and, if so, to provide you with a copy of the Personal Data we hold about you (along with certain other details).

- Right to Correction: If the Personal Data we hold about you is inaccurate or incomplete, you are entitled to ask for correction or completion.
- Right to Deletion: You may ask us to delete or remove your Personal Data in some circumstances—for example, if we no longer need it.

To request access, correction, or deletion of your personal information, call 1-833-904-9090 or complete this form [GQG CCPA Request Form](#) and email it to privacy@ggg.com. We may verify your request by asking you to provide information such as your name, email address, phone number, or company.

You may designate an authorized agent to exercise privacy rights on your behalf by providing the authorized agent signed permission to submit the request on your behalf. If an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your personal information.

Any request to exercise one of these rights will be assessed by GQG on a case-by-case basis. There may be circumstances in which we are not legally required to comply with your request because of a relevant legal exemption provided for under applicable law. We will not discriminate or retaliate against you for exercising your privacy rights.

You may contact us using the information set out in the “[How You Can Contact Us](#)” section below.

11. EUROPEAN and ADGM RESIDENTS

Pursuant to certain data protection laws, including in the European Union, the United Kingdom and the ADGM, we are required to have a lawful basis for processing Personal Data. Depending on what data protection laws apply to our processing of your Personal Data, we may be entitled to use your Personal Data for the purposes described above based on the following legal grounds:

- necessary to evaluate and potentially enter into an employment relationship with you;
- necessary to comply with our legal obligations;
- necessary to secure a vital interest of yours or of others; and
- for our (or others’) legitimate interests, including our interests in considering candidates for current and future employment opportunities and in managing and improving our recruitment and hiring process, unless those interests are overridden by your interests or fundamental rights and freedoms.

Our processing of your “special category” or “sensitive” Personal Data as described in section 2 is based on the following legal grounds:

- necessary to enable us to exercise our legal rights, and/or perform our legal obligations as your potential employer (e.g., to carry out criminal record checks, to ensure your health and safety during the recruitment process and in furtherance of non-discrimination on the grounds of race or disability) (provided that for ADGM processing, we have an appropriate policy document in place in accordance with ADGM data protection law);
- necessary for or in connection with actual or proposed legal action, in order for GQG to obtain legal advice or to establish, exercise, or defend its legal rights; or

- where the processing is of applicant data relating to race, ethnic origin, religious or other beliefs, physical or mental health and is necessary to identify or keep under review the existence or absence of diversity and inclusion at GQG.

In addition, in certain and very limited circumstances, the processing may be based on your consent where you have expressly given that to us.

We will only use Personal Data 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. If we need to use Personal Data for an unrelated purpose, we will notify the relevant individual and we will explain the legal basis which allows us to do so. Where our processing of Personal Data is based on your consent, you may withdraw the consent at any time. The withdrawal of the consent does not affect the lawfulness of processing based on the consent before its withdrawal. In case consent is withdrawn, we may only further process the Personal Data where there is another legal ground for the processing.

You may have certain legal rights in relation to your Personal Data. These rights may, depending on the location, circumstances, and the category of data in question, include the right to access, rectify, or erase certain Personal Data we have about you, or to request that your Personal Data is transferred to another party. You may also have the right to object to and restrict certain processing of Personal Data about you. Certain information may be exempt from such requests pursuant to applicable data protection laws. You can contact us using the information below to exercise your rights in relation to Personal Data about you. We will respond to your request consistent with applicable law.

We may require additional proof of identity to protect Personal Data against unauthorized access. We will carefully consider your request and may discuss with you how it can best be fulfilled.

If you have any concerns about how Personal Data about you is handled by us or wish to raise a complaint, you can contact us at the contact details below to have the matter investigated. If you are not satisfied with our response or believe we are processing Personal Data not in accordance with the law you can complain to the competent data protection supervisory authority (which may be dependent on where you reside, work, or the place of alleged infringement). For contact details of the relevant data protection authority in the EEA, please see http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm. You may file a complaint with the UK data protection authority online at: <https://ico.org.uk/make-a-complaint/> or by phone: 0303 123 1113. You may file a complaint with the ADGM Office of Data Protection by emailing data.protection@adgm.com or by phone: +971 23338888.

12. AUSTRALIAN RESIDENTS

This section is relevant where Australia's Privacy Act applies (e.g., where personal information is held by our Australian subsidiary, which processes personal information of Australian residents).

You may have certain rights in relation to Personal Data about you. This may include the right to access and rectify certain Personal Data we have about you. Certain information may be exempt from such requests pursuant to applicable data protection laws. You can contact us using information below to exercise your rights in relation to Personal Data about you. We will respond to your request consistent with applicable law, including by providing our reasons where required if we deny your request. Where we decide not to make a requested correction to your Personal Data and you disagree, you may ask us to note your requested correction with the information.

13. HOW WE UPDATE OR CHANGE THIS NOTICE

We may change or update parts of this Notice in order to maintain our compliance with applicable laws and regulation or following an update to our internal practices. Each version of this Notice is identified by its effective date. If we make changes to this Notice that have a material impact on your rights with respect to how we process Personal Data about you, we will notify you via appropriate communication channels. Please ensure that you regularly check this Notice, so you are fully aware of any changes or updates.

14. HOW YOU CAN CONTACT US

Please contact us using the details set out below, if you (1) have any queries about the contents of this Notice, (2) wish to inform us of a change or correction to Personal Data about you, (3) would like to exercise a legal right under applicable law to request a copy of the data we collect about you, or (4) would like to raise a complaint or comment.

Email: privacy@gqg.com

Post: Data Privacy Officer
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New York, NY 10171