

## RECRUITMENT PRIVACY NOTICE

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### 1. Introduction and Scope

- 1.1 Triland Metals Limited has issued this Recruitment Privacy Notice for those applying to be employees and other workers at Triland. For the purpose of this Notice, other workers shall include non-executive directors, workers (including temporary and agency workers), secondees, interns, independent contractors and consultants, professional advisors, other third parties applying to Triland to carry out work for us. This categorisation is for convenience and does not demonstrate any particular status.
- 1.2 The term "**applicants**" is used in this Notice to refer to anyone who applies for a job role, or who otherwise seeks to carry out work with or for Triland (whether on a permanent or non-permanent basis).
- 1.3 This Notice sets out the personal information that we collect and process about you, the purposes of the processing and the rights that you have in connection with it. Triland's other rules, policies and procedures set out ways in which you should use and process personal information in relation to others and with which you must comply. You should also bear in mind and act in accordance with the details and principles set out in this Notice when undertaking such processing.
- 1.4 We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. If you are in any doubt regarding the applicable standards, or have any comments or questions about this Notice, please contact us using the contact details further below. This Notice will be regularly reviewed and updated and it is your responsibility to ensure you are familiar, and act in accordance with, it.

### 2. Types of personal information we collect about applicants

- 2.1 In the course of you applying to work at Triland, we may process personal information about you and your dependents, beneficiaries and other individuals whose personal information has been provided to us.
- 2.2 The types of personal information we process includes, but is not limited to:
  - (a) Identification data and contact details – including your name, address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)).
  - (b) Employment history – such as previous employers and job titles/positions.
  - (c) Information on professional qualifications, achievements and/or skills, for example, academic/professional qualifications, education, CV/resume and languages spoken. This will also include any authorisations required in respect of your work, for example, evidence that you hold a particular category of driving licence, Disclosure and Barring Service ("**DBS**") (or equivalent) checking applications and responses and/or membership of a particular professional body.
  - (d) Background information – such as academic/professional qualifications, job qualifications, education, details included in your CV/résumé (which might include details of any memberships or interests constituting sensitive personal information), transcripts and employment references.
  - (e) Details of your nominated referees (including their name, contact details, employer and job role).

- (f) Details of your immigration/visa status.
- (g) Previous applications/roles (information relating to previous applications you have made to the Company's Group and/or any previous employment history with the Company's Group).
- (h) Other information you voluntarily provide throughout the process, including through assessment centres / exercises and interviews.
- (i) Information relating to any professional licences, authorisations and/or approvals, for example, registration and other information concerning regulatory approval under the rules of the Financial Conduct Authority ("FCA") or registrations with any other professional or regulatory body.

2.3 As a general rule, during the recruitment process, we try not to collect or process any of the following: information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health/sex life ("**Sensitive Personal Information**"), unless authorised by law or where necessary to comply with applicable laws.

- (a) However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring (on the basis that it is in the public interest and in accordance with applicable law), to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role. You may provide, on a voluntary basis, other Sensitive Personal Information during the recruitment process.

### 3. Sources of personal information

3.1 Usually you will have provided the information we hold about you but there may be situations where we collect personal information or sensitive personal information from other sources. The following are the types of information we may collect about you and the source of the information:

- (a) information about any "live" criminal proceedings, collected from the DBS and/or equivalent criminal records checking bodies;
- (b) information about your previous employment (including your employment record) and other information about your suitability to work at Triland from any referee provided by you;
- (c) information about your health, including your fitness to carry out work and/or any accommodations or adjustments to be considered from your GP, other specialist medical adviser or Triland's appointed medical expert;
- (d) information from any regulatory body governing the sector or sectors in which Triland operates;
- (e) certain publically available information from public sources (including the internet);
- (f) information collected during the application and recruitment process which may be received via an employment agency, background check provider and/or credit reference agency.

### 4. Purposes for processing personal information

4.1 We collect and use this personal information primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying our

reference checks or background checks (where applicable) and to manage the hiring process generally and communicate with you about it.

- 4.2 If you are accepted for a role at Triland, the information collected during the recruitment process will form part of your ongoing staff member record and will be processed in accordance with our Employee Privacy Notice.
- 4.3 If you are not successful, we may still keep your application to allow us to consider you for other suitable openings within Triland in the future unless you request that we delete your application. Your application will also be retained for a period in case of any disputes arising out of the recruitment process.

## 5. **Who we share your personal information with**

- 5.1 Triland takes care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this notice and that the confidentiality and integrity of the information is maintained.
- 5.2 We will share your personal information with other members of Triland's group of companies around the world to administer our recruitment processes and store data.
- 5.3 We make certain personal information available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data privacy law. For example, some personal information will be available to third party companies who provide us with services such as: recruitment or executive search agencies involved in your recruitment, HR and other data systems and storage, legal, financial and other advice, employee travel management, expenses reporting, general software/IT troubleshooting, occupational health advisers, background checking or other screening providers and relevant local criminal records checking agencies including the DBS (or equivalent criminal records checking agencies) and our insurance providers or their appointed agents.
- 5.4 We may also disclose personal information to other third parties on other lawful grounds, including:
  - (a) to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, or to meet national security or law enforcement requests, including, but not limited to, a court order or search warrant. Examples might include where information on you is requested by the Information Commissioner's Office (or equivalent data protection authority), the Health and Safety Executive, or where a report is necessary to the police;
  - (b) with your consent;
  - (c) as necessary to establish, exercise or defend against potential, threatened or actual litigation (for example, if a former colleague names you in connection with an tribunal or court proceedings concerning Triland);
  - (d) where necessary to protect the vital interests of you or another person (for example, if you are incapacitated and we need to arrange for emergency medical treatment); and
  - (e) in connection with the sale, assignment or other transfer of all or part of our business.

## 6. Transfer of your personal information outside of Europe

- 6.1 Triland is part of a global group of companies headquartered in Japan. As the group operates at a global level, we may need to transfer personal information to other countries where we operate (such as information on relevant experience you may have for a particular job or secondment or information hosted on a shared HR system).
- 6.2 Triland does not, as a general rule, export or transfer your personal information to third parties based outside of the UK. Data storage of Triland's HR system is local and no remote access is permitted.
- 6.3 When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws and legislation.
- 6.4 For example:
- (a) for transfers within the European Economic Area (EEA), we can be content that the same levels of protection will apply;
  - (b) for transfers from the EEA to other Company group entities and third parties located (or who store, use or process personal information) outside the EEA, for example, Commission decisions of adequacy in relation to that territory, pursuant to European Commission approved standard contractual clauses, in reliance on the EU-US Privacy Shield or binding corporate rules.

## 7. Data retention periods

- 7.1 Personal information will be stored only as long as is necessary to carry out the purposes described in this Notice or as otherwise required by contractual agreements with third parties, law or other Company policies.
- 7.2 In particular, Triland seeks to ensure that your personal information is held and, where appropriate, securely deleted or destroyed in accordance with policies, guidance and rules circulated on the retention of data from time to time.
- (a) In line with industry standards, Triland's retention of your personal data is, as a general rule, prescribed to a period of 6 months after confirmation that your application was unsuccessful.
  - (b) At the end of the appropriate retention period, Triland executes secure methods of: (i) destruction of hardcopy data, which are initially stored with reference to a destruction date; and (ii) deletion of electronic records on the HR database, which can identify data that are at the end of their retention period.

## 8. Your data protection rights

- 8.1 You have a number of data subject rights under applicable data protection law, including the right to request:
- (a) **access** to a copy of your personal information;
  - (b) **erasure** of your personal information (this is also referred to as the right to be forgotten);
  - (c) that processing of your personal information **ceases** (the right to object to processing);
  - (d) **rectification** of your personal information;
  - (e) **restriction of the processing** of your personal information;

- (f) **portability** of your personal information; and
- (g) not to be subject to **automated decision making**.

- 8.2 Triland will be the data controller in respect of the personal information referred to in this policy. If you have any questions about your data subject rights or wish to make a request to exercise them in relation to personal information referred to in this policy, you should make a request (where possible, clearly labelled as such) in writing to the IT Security Officer, Mr David Cumming by email to david.cumming@triland.com or by post to MidCity Place, 71 High Holborn, London WC1V 6BA, England. For access requests to data relating to employment matters, you should also copy in your request to the Head of Human Resources, Mr Brian Starling by email to brian.starling@triland.com or by post to the address stated above.
- 8.3 You should note that there are a number of exceptions, exemptions, restrictions and qualifications in relation to the data subject rights described above, for example:
- (a) Triland may request identification documents to verify that the request is made by you or on your behalf;
  - (b) Triland may decline to act on any request which is deemed excessive and/or manifestly unfounded (for example, where repeated requests have been made). If Triland is prepared to act on such a request anyway, it may charge a reasonable fee; and/or
  - (c) where a request is particularly complex, Triland may be unable to respond fully within the usual applicable time limit and may need to extend the time period.
- 8.4 There are other specific exemptions and limitations which relate to the data subject rights. Triland will seek to engage with you to discuss any exceptions, exemptions, restrictions and qualifications after any request is made and if it considers that they apply in the circumstances.
- 8.5 If you receive a data subject rights request from an individual, you should forward it securely and as soon as possible to the person identified above by using the contact details set out above.

## 9. Updates to this notice

This notice may be updated periodically to reflect any necessary changes in our privacy practices. You have a responsibility to ensure that you regularly review this notice and we shall indicate at the bottom of the notice when it was most recently reviewed.

## 10. Questions and comments

- 10.1 You can address any questions or comments relating to this policy to the Head of Human Resources, Mr Brian Starling, by email to brian.starling@triland.com and our privacy practices generally to Triland's IT Security Officer, Mr David Cumming, by email to david.cumming@triland.com.
- 10.2 You have a right to lodge any complaints with the relevant supervisory authority which, in the UK, is the Information Commissioner's Office, however, we would of course encourage you to raise any issues with Triland first.