

RECRUITMENT PRIVACY NOTICE

The Contrarius Group Companies ("Contrarius", "us" or "we"), understand that your privacy is important to you. Contrarius may process your personal data in their capacity as 'data controllers'. We are committed to respecting your privacy and protecting your personal data. This Recruitment Privacy Notice ("Privacy Notice") describes how we handle and protect your personal data in connection with any Contrarius recruiting processes and programs.

This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment, and our optional recruiting programs and events. It does not apply to our employees, contractors or clients.

We will process your personal data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail.

By submitting your personal data to us, you acknowledge that:

- You have read and understood this Privacy Notice and agree to the use of your personal data as set out herein.
- Your personal data may be transferred and processed worldwide, including countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Privacy Notice.
- You are not required to provide any requested information to us, but failing to do so may result in not being able to continue your candidacy for the job for which you have applied.
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by Contrarius.

What information do we collect?

The types of personal data that we request from you and the ways that we process it are determined by the requirements of the country in which the position is located, and not the country in which you reside. Should you apply to more than one location or should the role to which you apply be available in more than one country, the types of personal data we request from you and the ways that we process it are determined by the requirements of all the countries in which the position is located.

Contrarius may collect a range of information about you. This could include:

- Personal identification data such as your name, date of birth, residential address and phone number;
- Government-issued Identification such as passports or national identity cards;
- Immigration, right-to-work and residence status; Job-related information, such as years of service, work location, employment ID, work record, vacation absences, and contract data;
- Information about previous employment, education, and other interests (if included in your CV);
- Educational and training information, such as your educational awards, certificates and licences, vocational records and in-house training attendance;
- Recruitment and performance-related data, such as objectives, ratings, comments, test results, career history, skills and competencies and other work-related qualifications;
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data; and
- Payroll- and payment or benefits-related information, such as salary and insurance information, government identifier or tax numbers, bank account details, and employment related benefits information.

We usually collect personal data directly from you when you apply for a role with us. We also may collect personal data about you from third parties, such as professional recruiting firms, your references, prior employers and employment background check providers, to the extent this is permitted by applicable law. This list is not exhaustive and Contrarius may collect more personal data where it is required as a result of a legal obligation.

Sensitive personal data is a subset of personal data and includes ethnicity, health, trade union membership, philosophical beliefs, sexual orientation, as well as other categories as prescribed by law. We do not seek to obtain such data about a candidate unless permitted to do so by applicable laws.

Why does Contrarius process personal data?

In relation to the recruitment process, we may collect and use your data for legitimate human resources and business management reasons including:

- identifying and evaluating candidates for potential employment;
- recordkeeping in relation to recruiting and hiring;
- ensuring compliance with legal requirements, including eligibility to work in a jurisdiction and diversity and inclusion requirements and practices where applicable;
- conducting criminal history checks as permitted by applicable law;
- protecting our legal rights to the extent authorized or permitted by law.

We may process your personal data for the purposes described above: when necessary to enter into an employment contract with you; when necessary for us to comply with a legal obligation; or when necessary for the purposes of our legitimate interests as an employer operating globally.

Who has access to data?

Your information may be shared within the Contrarius Group for the purposes of the recruitment exercise. This includes any interviewers involved in the recruitment process, managers in the business area or any Group Company Directors. Your personal data may also be accessed by recruiters, if they are involved in the recruitment process. Your personal data may also be shared with other third party service providers that may assist us in administering and evaluating pre-employment screening and testing. Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

We will not share your data with any other third parties, unless your application for employment is successful and we make you an offer of employment, or unless required to comply with legal obligations. We maintain processes designed to ensure that any processing of personal data by third party service providers is consistent with this Privacy Notice and protects the confidentiality, availability, and integrity of your personal data.

If an offer for employment is accepted, we may then, for example, share your data with former employers to obtain references for you, compliance consultants and employment background check providers to obtain necessary background checks.

We will not sell your personal information or share it with third parties for use in marketing their products and services.

We may transfer your personal data outside the European Economic Area

Contrarius maintains physical, electronic and procedural safeguards to protect applicant's non-public personal information. Even though we have taken significant steps to ensure that your personal information is not misused, you should know that we cannot fully eliminate security risks associated with personal information. The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be processed by individuals operating outside of the EEA who work for the Contrarius Group. This could include transfers of personal data to Jersey, Bermuda, Australia, South Africa, the UK (should it leave the EEA) and the USA. Certain countries may have different data protection standards to those which apply in the EEA. Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA in compliance with data protection law.

How does Contrarius protect data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does Contrarius keep data?

If your application for employment is unsuccessful, the organisation will hold your data on file for 6 (six) months after the end of the relevant recruitment process or such time as required to meet regulatory obligations. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights.

You can:

- access and obtain a copy of your data on request;
- require Contrarius to change incorrect or incomplete data;
- require Contrarius to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and

- object to the processing of your data

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you would like further information on how Contrarius uses your personal data, the exercise of any of the rights listed above or have a complaint, you may contact privacy@contrarius.com. This Privacy Policy takes effect on 25 May 2018.