

# **Recruitment Privacy Statement**

This privacy statement sets out how Tibra Capital Pty Limited and its related group entities ('Tibra') use and manage personal data for recruitment purposes. Tibra operates across various jurisdictions including Australia and the United Kingdom. This statement operates in conjunction with relevant privacy and data protection laws in those jurisdictions and may be amended by Tibra from time to time.

#### How Tibra collects personal data:

Tibra may collect personal data:

- Directly from you, for example where you apply for recruitment or communicate information to Tibra orally or in written form during the recruitment or interview process; and/or
- From others with your consent, such as:
  - where you apply for a position with Tibra through a third party recruitment agent, and the recruitment agent provides your details, including your employment application, to Tibra; and
  - where Tibra conducts criminal records, reference of other checks as part of the recruitment process.

#### Why and how Tibra uses personal data:

Tibra may collect personal data necessary for recruitment purposes. This includes personal data required to verify your identity and assess your suitability for employment opportunities with Tibra and its related companies.

Where you have applied for a position with Tibra, Tibra may use the personal data contained in that application or otherwise provided by you or your others during the recruitment process for the purposes of:

- evaluating your application;
- assessing your suitability for employment opportunities with Tibra;
- satisfying regulatory obligations, including but not limited to assessing your suitability for, or appointing you to, control functions or other roles where you represent Tibra;
- maintaining records of the recruitment process; and
- · contacting you regarding Tibra employment opportunities.

Unless authorised by relevant laws, your personal data will not be used for any other purpose without your consent.

# Legal basis for processing:

Tibra relies on the following legal bases for processing personal data:

- To take necessary steps prior to entering into an employment contract;
- Tibra's legitimate interests in making recruitment decisions;
- Compliance with Tibra's legal obligations, including applicable privacy and data protection, anti-discrimination, employment and immigration laws; and
- Your consent in relation to personal data, including sensitive data, which can be withdrawn at any time.

# What personal data Tibra may collect:

Data may include (but is not limited to) employment application information, information communicated by you to Tibra during the interview process, information communicated to us by your agents based on discussions between you and them, identification and contact details, employment and education history, qualifications and skills, results from reference checks, evidence of eligibility to work in the relevant jurisdiction, results of any tests and sensitive data such as your criminal history.

The collection of personal data is not required by law. You may choose not to provide some or all personal data to Tibra. However, Tibra may be unable to consider your application for employment.

# How does Tibra store and secure personal data:

Personal data may be stored in hard copy or electronically. Tibra takes all reasonable steps to ensure the security and confidentiality of personal data. This includes protecting it from misuse, loss, unauthorised access, modification or disclosure.

Tibra has a secure electronic environment and policies and procedures that govern the protection of data and confidentiality. Personal data will be retained in line with Tibra's internal document retention policies that meet relevant laws. Records containing personal data will be disposed of securely.

# Who Tibra may disclose personal data to (including across borders):

Unless compelled by a regulatory body, in accordance with a compulsory legal notice or as authorised by law, Tibra will not disclose your personal data without your consent.

As part of its business activities, Tibra may wish to disclose your personal data to related companies, or to service providers who may be located outside your home jurisdiction or hold data in the cloud. Tibra takes reasonable steps to ensure these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal data.

You consent to Tibra disclosing your personal data to its subsidiaries and service providers across borders for the uses outlined in this Statement.

You consent to Tibra disclosing your personal data to any recruitment agent acting on your behalf.

#### Accessing your personal data:

You may request access to personal data that Tibra holds about you by contacting Tibra's Talent team at <u>careers@tibra.com</u>. You may be asked to verify your identity before access can be granted.

If the personal data is incorrect, you may request that Tibra amends its records and Tibra will take reasonable steps to do so.

Where permitted, Tibra may make reasonable charges for access to data and may refuse to provide access to, or delete, data where this is required or authorised by law.

You may request that Tibra remove your personal data from its records when, and to the extent, permitted by law.

### Complaints about personal data:

If you are concerned about a potential or perceived breach of your privacy, please contact Tibra's Legal & Compliance team at <a href="mailto:compliance@tibra.com">compliance@tibra.com</a>, who will undertake to resolve your complaint as soon as reasonably practicable, and no later than 30 days of receipt of your complaint.

If you are not satisfied with the above, you may take your complaint:

- In Australia: to the Office of the Australian Information Commission at <a href="https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint">https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint</a>
- In the United Kingdom: to the Information Commissioner's Office at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>
- For all other jurisdictions, contact the relevant authority responsible for privacy and data protection.

## Applicable privacy and data protection laws and principles:

- Australia: Privacy Act 1988 (Cth), Australian Privacy Principles
- United Kingdom: Data Protection Act 2018
- Europe: General Data Protection Regulation (Regulation EU 2016/679)

Unless you let Tibra know otherwise in advance, you will be deemed to have accepted the above terms if you continue with any application process, whether you have completed this form or not.