



**Gallagher**

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## Gallagher – Data Privacy Statement for Job Applicants

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## Introduction

The Privacy Statement describes the handling of personal information obtained from applicants or prospective applicants for employment. This statement applies to personal information submitted directly by you, as well as by third-party agencies and recruiters on your behalf.

This Privacy Statement describes the practices of Gallagher, the company to which you are applying for a job opportunity (as identified in the applicable advertisement), and any subsidiaries, affiliates, and related companies (which are referred to simply as "Gallagher" in this statement).

## Principles

### I. **Principle of collection limitation**

Data controllers shall set limits for the collection of personal data and comply with legal and fair means for its collection, whenever appropriate, with the knowledge or consent of the data subject concerned.

### II. **Principle of data quality**

Personal data shall be relevant to the purpose of its use and, to the extent necessary for that purpose, accurate, complete, and current.

### III. **Principle of purpose specification**



The purpose of data collection shall be specified at the latest at the time of collection and its use shall be limited to the fulfillment of the purposes or other purposes that are not incompatible with the original purpose, specifying the change of purpose from time to time.

#### **IV. Principle of use limitation**

Personal data shall not be disclosed, made available, or used for purposes that are not outlined in this statement, unless the following requirements are met:

- With the consent of the data subject, or
- If required by law or by the authorities.

#### **V. Principle of safeguarding the security**

Reasonable security safeguards will be employed to protect personal data against risks, such as loss, unauthorized access, destruction, use, modification, or disclosure.

The above principles will guide the collection, processing, and authorisation of the processing of personal data.

## **Collecting your information**

### **Information we collect directly from you**

In the course of your application being submitted, Gallagher will receive and hold your personal information, which may include 'sensitive' personal information depending on the nature of your application, such as:

- I. Contact information, such as your name, address, email address, or phone number.
- II. Information contained in your resume or CV, LinkedIn profile, online employment profile, and other documents related to the application or hiring process, such as a cover letter, references, licensing information, certifications, and similar items.
- III. Information about your authorisation to work in the relevant jurisdiction.
- IV. Demographic information including your age and gender, and where applicable and in accordance with the law, your ethnicity, and disability status.
- V. Details regarding any criminal history, in accordance with applicable laws in force and the relevant jurisdiction.
- VI. Information required for specific aptitude, personality, or skills assessments.
- VII. Any other information you choose to provide to Gallagher in connection with your application.



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## **Information we may collect from other sources**

- I. Background check information from available screening agencies, recruitment agencies, or public records as permitted by local law, e.g., address history, work experience or employment history, social security number, identity card number or another national identifier, date of birth, and sex.
- II. Criminal and credit history, education, employment verification, references, address searches, public safety verification, and professional certifications.
- III. Publicly accessible, members-only professional profiles available on websites or social networking sites (e.g., LinkedIn).
- IV. Educational, licensing, and professional agency training records.

On certain occasions, Gallagher may be required by law to collect certain personal information about you as a consequence of (or to enter into) any contractual relationship Gallagher has with you. Failure to provide this information may prevent or delay the performance of these obligations. Gallagher will inform you at the time of collecting your information whether certain information is mandatory and the consequences of failure to provide such information.

## **Using your information**

Gallagher will use the information you have provided for the following purposes:

- Consider your general and specific suitability for the job, including assessing your aptitude and skill set.
- Verify the information you have provided, including conducting the screening.
- Arrange interviews.
- Making an offer of employment.
- Contact you to obtain detailed information about future roles and positions that may be of interest to you.
- Complying with obligations imposed by laws and regulations for which Gallagher is responsible.
- Conducting general statistical analysis and reporting, including candidate activity and demographic reporting.
- Any other requirements arising from the employment, business, and social relationship between Gallagher, the individuals concerned, and their related companies.



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If you become an employee of Gallagher, any personal information you submit through the application process will be used in connection with your employment as set out in your employment contract, internal policies, and procedures, and as permitted by applicable laws.

In most cases, our objective in processing your personal information will be:

- To comply with Gallagher's legal obligations, for example, obtaining evidence of your identity to enable us to comply with our anti-money laundering obligations, or obtaining evidence of your employment status to enable us to comply with relevant obligations.
- To comply with Gallagher's legal obligations to you (including, for example, health and safety or anti-discrimination obligations that Gallagher must comply with), or to a third party (including tax authorities, health insurance providers, social security agencies, or other government authorities).
- To meet Gallagher's legitimate operational needs and interests, for example, to effectively manage prospective employees and protect the Company against theft or other crimes. Whenever Gallagher processes personal information, Gallagher implements reasonable security measures to ensure that your privacy is protected and that legitimate business operational interests are protected.
- Gallagher may obtain your consent to collect and use certain types of personal information, where permitted by law in each jurisdiction, to conduct direct marketing activities, cookies, and tracking technologies, as well as to process sensitive personal information.
- If Gallagher requests your consent to process your personal information, you may withdraw your consent at any time after giving it by contacting us using the details at the end of this Privacy Statement.

## Automated Decisions

In limited circumstances, some Gallagher entities may process your information through automated applications that allow them to assess your profile's affinity with the position to be filled. These applications may process and evaluate your personal information to make decisions and create profiles about you to determine your suitability and eligibility for general or specific employment.

Gallagher will only make these automated decisions about you in cases where:

- The description of certain skills of the candidate that are necessary to enter into a contract. For example, Gallagher may decide not to offer you a job based on information that demonstrates ineligibility for employment.

Such decisions are required or authorised by law, for example, for fraud prevention purposes.

- You specifically consent to Gallagher's automated decision-making.

Subject to local legal requirements and limitations, you may contact Gallagher to request more



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information about automated decision making, object to the use of automated decision making, or request an employee review.

Gallagher does not rely on or use automated decision-making based on your personal information to make meaningful employment decisions.

## Sharing your information

The Company to which you are applying for a job opportunity, as identified in the relevant advertisement, is the "controller" responsible for the personal information it collects and processes. In this regard, it is the data controller and can be contacted at the contact information listed at the end of this statement.

Gallagher may share your personal information with carefully selected third parties who provide various services to Gallagher, and who have entered into agreements with Gallagher for the protection and non-disclosure of the personal information and data they receive from us, among them:

- Providing background checks, including credit or criminal check verification services and medical examinations (to the extent such checks are permitted by applicable law).
- Recruitment and selection.
- Professional, elective and mandatory training.
- IT services such as website management, data analysis, and data backup.
- Security and storage services.

When this occurs, Gallagher takes reasonable and appropriate technical, administrative and physical measures to keep your personal information secure. Where necessary, your personal information may also be disclosed to law enforcement, regulatory, or other government agencies, or third parties to comply with legal or regulatory obligations or requests. To the extent permitted by law, Gallagher disclaims any liability arising from the use of your personal information by third parties. In all cases, data transfers will be recorded and documented, identifying the recipient of the data, the purpose of the transmission, and the type of data that was transmitted. Where permitted by law, Gallagher may, upon request, confirm the name of each third party to whom personal information is or will be transferred.

Gallagher is part of a global group of companies and, for recruitment and employment purposes, may use resources and servers located in various countries around the world to access, store or process your personal information, including outside the jurisdiction in which you reside. Please see the section on international data transfer below for more information.



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## Retaining your information

Gallagher will store your personal information in accordance with its statutory obligations, internal policies, and procedures.

Gallagher will retain your personal information for as long as required by law and necessary for employment administration purposes. If your employment application is unsuccessful, Gallagher may retain your personal information for a reasonable period with respect to Gallagher's legitimate business purposes and potentially contact you about other relevant employment opportunities. If you have applied through our "Careers site/ vacancy application website", we will generally delete your information two years after your last contact with us. Please let us know during the application process or by using the contact details address below if you do not want us to store your personal information to receive notifications about future employment opportunities. When required by law, we will only retain your personal information to notify you of other employment opportunities when you have given consent.

## International Data transfer

Your personal information may be transferred to, stored, and processed in a jurisdiction other than your local jurisdiction. You consent to the transfer, disclosure, storage, and/or processing of your personal information outside of the jurisdiction in which the information was originally collected.

Gallagher implements reasonable safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal information is adequately protected. For more information on appropriate safeguards, please contact us at the details below.

## Your rights and responsibilities

You are responsible for ensuring that the personal information and information you submit is accurate and up to date, as any incorrect information may invalidate your application and, if applicable, any offer of employment. In addition, you may have certain rights (subject to local law) with respect to your personal information, including the rights to:

- Access your personal information
- Request proof of prior authorisation or consent given to us to collect and process personal information.
- Correct errors in the information Gallagher holds about you.
- Delete your personal information.
- Restrict Gallagher's use of your personal information.
- File requests, complaints, or grievances about Gallagher's use of your personal information.



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- Request information about AJG Group's use and processing of your information.
- Revoke the consent given by you for the processing of your personal information.
- File a complaint with the local data protection authority.
- Receive your personal information in a usable electronic format and transmit it to third parties (right to data portability).

If you need more information about how your personal information is used or wish to review, update, delete, or request access to your personal information, please contact [hr@ajg.ie](mailto:hr@ajg.ie).

Gallagher is committed to working with you to obtain an appropriate and fair resolution of any complaints or concerns about privacy. However, if you believe that Gallagher was unable to assist you with your complaint or concern, you may have the right to file a complaint with your local data protection authority.

## Contact us

If you have questions or concerns about how your personal information has been collected, stored, used, or disclosed, please contact us at: [hr@ajg.ie](mailto:hr@ajg.ie) or contact the person you have been in contact with regarding your employment.

You can contact our data protection officer at: [dpo@ajg.ie](mailto:dpo@ajg.ie)

## Changes to this Privacy Statement

This Privacy Statement may be updated periodically to reflect changes in Gallagher's personal information practices or applicable laws. The current version is available on Gallagher's website at [ajg.ie/applicant-privacy](http://ajg.ie/applicant-privacy). Where changes to this privacy notice will have a fundamental impact on the nature of the processing or will have a material impact on you, Gallagher will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g., object to those changes).

**Effective Date:** November, 2 2022