

Introduction

This notice (Notice) describes how Iris Insurance Brokers Ltd (Iris) and its subsidiary companies handle and protect data Iris is provided in connection with the recruiting process.

By making available your Candidate Data, as defined below, you confirm that:

- You have reviewed this Notice and agree that Iris may process your Candidate Data in accordance with this Notice;
- You have provided any notices and obtained any consents needed to provide information concerning others (e.g., information about employment references); and
- Your Candidate Data may be transferred and processed worldwide, including the US and other 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 Notice.

Iris will process Candidate Data in accordance with this Notice, unless in conflict with requirements of applicable law, in which case applicable law will prevail.

Your consent to the provisions of this Notice is required in order to submit or make available Candidate Data. If you decline to submit or make available your Candidate Data, it may affect your ability to apply for or receive an offer of employment.

This Notice does not form part of any contract of employment offered to candidates hired by Iris.

Definitions

Candidate Data is identifiable information that an individual makes available to Iris in connection with the recruiting process. Iris may collect Candidate Data directly from a job candidate or from third parties, for example, in connection with a background or employment check or employment reference, subject to your consent where required by law. Candidate Data may include a variety of information, such as candidate status, work history/job data, education, compensation, employer feedback, questionnaire results, contact information, previous addresses or names, additional information provided by the candidate (e.g., a cover letter), driver's license number as required for certain positions, references, and criminal history where permitted by law.

Processing refers to any action performed on Candidate Data, such as collecting, recording, organizing, storing, transferring, modifying, using, disclosing, or deleting.

Sensitive Candidate Data is Candidate Data concerning nationality or citizenship, race or ethnic origin, criminal history, or trade union membership. Iris does not request or consider information concerning religion, sex life or political opinions in connection with recruiting.

Collection

You may use various electronic and paper methods to submit Candidate Data to Iris. You agree that, in addition to collecting Candidate Data directly from you, Iris may collect Candidate Data from third parties, for example, from recruiters, in connection with a background or employment check or an employment reference (subject to your consent where required by law) or, to the extent permitted by law, from a recruiting or other web site.

Processing and Retention

Iris processes Candidate Data for legitimate human resources purposes. These include identifying and evaluating candidates for Iris positions; record-keeping related to hiring processes; analyzing the hiring process and outcomes; and conducting background checks, where permitted by law. In addition, Candidate Data may be used to comply with Iris' legal, regulatory and corporate governance requirements. If a candidate is hired, Candidate Data will be used in connection with the candidates' employment, consistent with Iris' employment data protection policies.

In addition to using Candidate Data for the position for which you have applied, Iris may retain and use your Candidate Data to consider you for other positions. If you do not want to be considered for other positions or would like to have your Candidate Data removed, you may contact Iris as specified under Enquiries, Complaints and Objections below. Unless required for tax or other legal purposes or in connection with employment as specified above, Candidate Data will be retained for a maximum of three years (or less where required by law).

Sharing with Third Parties

Iris may transfer Candidate Data to external third-party providers performing certain services for Iris. Such third-party providers have access to Candidate Data solely for the purposes of performing the services specified in the applicable service contract, and Iris requires the providers to undertake security measures consistent with the protections specified in this Notice.

Iris may be required to disclose certain Candidate Data to other third parties as required by law; to protect Iris' legal rights to the extent authorized or permitted by law; or in an emergency where the health or safety of a candidate or other individual may be endangered. In addition, in the event of a re-organization, merger, sale, joint venture,

assignment, or other transfer or disposition of all or any portion of Iris' business, Iris may transfer Candidate Data to successor entities or parties.

Security and Confidentiality

Iris employs technical and organizational measures designed to protect the integrity, confidentiality, security and availability of Candidate Data, and to comply with applicable legal requirements for information security. Iris limits access to internal systems that hold Candidate Data to individuals who need access for a legitimate business purposes.

Candidate Rights

You may exercise the following rights in relation to your Candidate Data:

Access, Correction and Deletion: Iris will provide you access to your Candidate Data that they hold to the extent required by law. You may request correction or deletion of that Candidate Data, except where retention is required by your contractual relationship with Iris, in the context of a legal dispute, or as otherwise required by law. If access, correction or deletion is denied, the reason for the denial will be communicated to you.

Inquiries, Complaints and Objections: You may withdraw consent to the processing of your Candidate Data or submit inquiries, complaints and/or objections to the processing of your Candidate Data by sending a request in writing to: Data Protection Officer, 80 Baxter Ave, Southend on sea, Essex, SS2 6HZ or by email at HR@irisib.com. The processes described in this Notice supplement any other remedies and dispute resolution processes provided by Iris and/or available under applicable law.

Changes to this Notice

Iris reserves the right to modify this Notice at any time.