

GDPR Candidate Privacy Notice

1. Introduction

William Blair and all its affiliated companies, which includes but is not limited to: William Blair & Company, LLC, William Blair Investment Management, LLC, William Blair International Limited, William Blair Investment Services (Zurich) GmbH, William Blair International Limited (Frankfurt), William Blair & Company LLC (Australia) (hereinafter referred to as “William Blair”, “we”, “us” or “our”) is a “data controller” for the purposes of the General Data Protection Regulation ((EU) 2016/679) (“GDPR”). This means that we are responsible for deciding how we hold and use Personal Data about you.

You are being sent a copy of this privacy notice (“**Candidate Privacy Notice**”) because you are applying for work with us (whether as an employee, worker or contractor in one of our offices situated in either the US, the UK, the Netherlands, Germany or Switzerland). This notice makes you aware of how and why your Personal Data will be used, namely for the purposes of the recruitment process, the on-boarding process, immigration process, performance review process, and also how long your Personal Data will usually be retained for. It also provides you with certain information that must be provided to you under the GDPR, including the legal basis for Processing (as defined below) your Personal Data as part of your application for employment

2. Definitions

For the purpose of this Candidate Privacy Notice:

“**Data Subjects**” means and may include, but are not limited to: customers, clients, current and former employees, job applicants, agency, contract and other staff, suppliers and marketing contacts;

“**Personal Data**” means any information relating to Data Subjects. Personal Data includes identifiers such as names, addresses, IP addresses, identification numbers, and location data;

“**Processing**” or “**Process**” means any operation or set of operations which is performed on personal data, whether

or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Special Categories of Personal Data**” includes information about a person’s racial or ethnic origin, or physical or mental health or condition.

3. Legal Basis for Collecting Your Personal Data

We are able to legally collect and use your Personal Data because collecting and using your Personal Data is necessary for us to:

- comply with a legal obligation to which we are subject, including our legal obligations under employment laws;
- perform our contractual obligations as a prospective employer and/or engager of personnel in contracts to which the Data Subject is a party or in order to take steps at the request of the Data Subject prior to entering into a contract; and/or
- carry out our legitimate business interests in conducting our business as a trading firm with you as a prospective employee, contractor or other personnel of the business. This legitimate interest includes but is not limited to, recruitment and administration.

4. Data Protection Principles

We will comply with data protection law and principles, which means that your Personal Data will be:

- a. used lawfully, fairly and in a transparent way;
- b. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- c. relevant to the purposes we have told you about and limited only to those purposes;
- d. accurate and kept up to date;
- e. kept only as long as necessary for the purposes we have told you about; and
- f. kept securely.

5. The Kind of Information We Hold About You

In connection with your application for work with us, we may collect, store, and use the following categories of Personal Data about you:

- a. the information you have provided to us for example in your CV and covering letter;
- b. the information you have provided on our application form, including name, title, home address, telephone number, personal email address, date of birth, gender, compensation history, employment history, education history, criminal record history, credit history, qualifications and right to work in the UK; and
- c. any information you provide to us during an interview or at any other stage of your application, including the fulfilment of any assessments that you performed during the interview process.

6. How Is Your Personal Data Collected?

We collect Personal Data about candidates from the following sources:

- a. you, the candidate;
- b. recruitment agencies, from which we collect the following categories of data: contact information (e-mail, phone number, and addresses), employment history, education history, compensation history, and role and compensation expectations;
- c. Our background check provider (which is currently Sterling Talent Solutions “**Sterling**”), from which we may collect the following categories of data: contact information (e-mail, phone number, and addresses), employment history, education history, compensation history, credit history, criminal history, health information including drug tests, driving records, employment or volunteering history (including fiduciary or directorship responsibilities), financial history, (including credit history, bankruptcy and final judgements), identity (including identifying numbers and identity documents), inclusion on watch or sanctions lists, membership, registration or disciplinary action with regulatory or professional bodies, mentions in online or print media, other people’s opinions about your performance or character and your social media activity. A complete list of the checks and sources of personal data we and Sterling may collect about you are available

at www.sterlingtalentsolutions.com/pven/#why-we-collect.

We understand that Sterling may share your personal information with third parties to validate its accuracy or obtain specialised services, such as data storage or translation services—please refer to their privacy notice set out above for further information.

Some of the abovementioned checks will only be carried out for specific roles or in certain countries as required by local law or which are for legitimate business reasons.

7. How We Will Use Information About You

We will use the Personal Data we collect about you to:

- a. assess your skills, qualifications, and suitability for the role;
- b. carry out background and reference checks, where applicable
- c. communicate with you about the recruitment process;
- d. keep records related to our hiring processes; and
- e. comply with legal or regulatory requirements.

8. If You Fail to Provide Personal Data

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

9. How We Use Special Categories of Personal Data

We will use your Special Categories of Personal Data in the following ways: we will use information about any disability or health condition you may have to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an assessment or interview or in our communication to you.

We have in place an appropriate policy document and safeguards, which we are required by law to maintain when Processing such data.

10. Automated Decision-Making

You may be subject to decisions that will have a significant impact on you based solely on automated decision-making.

11. Data Sharing

We will only share your Personal Data with the following third parties for the purposes of processing your application: our relevant William Blair staff across our different offices, any background check company (currently Sterling Talent Solutions), and a search firm if applicable. All our third party service providers and other entities in the group are required to take appropriate security measures to protect your Personal Data in line with our policies. We do not allow our third party service providers to use your Personal Data for their own purposes where this personal data has been provided by ourselves. We only permit them to Process your Personal Data for specified purposes and in accordance with our instructions.

12. Data Security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only Process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

13. Data Retention

We will retain your Personal Data for as long as is necessary after we have communicated to you our decision about whether to appoint you to a role. We retain your Personal Data for that period in case there are further job opportunities in the near future or so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your Personal Data in accordance with applicable laws and regulations.

14. Your Rights In Connection with Personal Data

Please refer to our William Blair Privacy Notice at <https://www.williamblair.com/-/media/Downloads/Disclaimers/William-Blair-Privacy-Notice.pdf>.

15. Further Questions

If you have any questions about this Candidate Privacy Notice or how we handle your Personal Data, please refer to our William Blair Privacy Notice referenced above, or see our contact information below. You have the right to make a complaint at any time to the relevant authority:

United Kingdom: Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues.

16. Our Contact Information

Please contact us if you have any questions about this Candidate Privacy Notice or information we hold about you.

Email:

DPO@williamblair.com

Mail:

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