

## FM Employment Candidate Privacy Notice

This Employment Candidate Privacy Notice ("Notice") sets out the basis on which FM processes and protects the Personal Information (defined below) we collect from you in order for us to assess your suitability and eligibility for recruitment purposes (the "Recruitment Activities"), and to support FM's culture and employee experience initiatives. This Notice applies to Personal Information provided by you and the recruitment agencies who represent you and who submit Personal Information on your behalf (collectively referred to as "Recruitment Agencies", "you" or "your").

Throughout this Notice, "FM" refers to Factory Mutual Insurance Company, together with its worldwide subsidiaries and affiliates (also referred to as "we", "us", or "our"). Your relevant data controller will be the FM entity taking part in the Recruitment Activities, or which otherwise collects your Personal Information.

Nothing in this Notice shall apply to the extent it is incompatible with applicable law in the jurisdiction of the Recruitment Activities.

### **TYPES OF PERSONAL INFORMATION WE MAY COLLECT ABOUT YOU:**

"Personal Information" refers to information which does or is capable of identifying you as an individual. The types of Personal Information that we process (which may vary by country and by role, and in each case where permitted by applicable law) may include:

- your name, postal address and telephone number;
- date of birth, language, country of origin, gender;
- work eligibility including residency and work permit status, nationality, passport information and social security number;
- emergency contacts, next of kin and dependents including their name, postal address, telephone number, social security number or national identification documents and date of birth;
- job title and description of role;
- current or previous work email address, other work contact details and photograph;
- health information including sick absences, disabilities, health assessments and medical insurance;
- bank details for processing salary and expenses payments;
- CV or resume based information, including qualifications, educational history, awards and professional memberships;
- driver's license details, vehicle registration and driver history;
- criminal record, credit and background checks;
- skills assessments;
- marital status;
- ethnicity and veteran status; and
- membership of or affiliation to a trade union.

Certain of the above types of Personal Information are considered "sensitive" and, depending on your country of work and applicable law, additional rules will apply in respect of this Personal Information. We may collect the following types of sensitive Personal Information:

- health;
- bank details;
- identity cards;
- biometric data;
- criminal records;
- ethnicity;
- veteran status and
- trade union membership.

All references to Personal Information in this Notice shall include, when applicable, sensitive Personal Information.

## **USE OF PERSONAL INFORMATION**

We will use the Personal Information we collect for the purposes of performing our duties in furtherance of the Recruitment Activities, to enable us to take actions and make decisions regarding your recruitment, potential employment, to support FM's culture and employee experience initiatives and to comply with our legal and regulatory obligations. Personal Information may also be used to exercise our legal rights and protect our interests in the event any of the information you provide is relevant or helpful in connection with legal actions brought by or against us.

## **RETENTION OF PERSONAL INFORMATION**

Unless you become employed by FM, Personal Information will be kept for no longer than is necessary in connection with the Recruitment Activities and will be retained for the duration of the recruitment process plus no longer than 12 months (or a shorter period if required by local legislation). In the European Union, UK, and Switzerland your data will be retained for the recruitment process plus no longer than 6 months. In certain cases, laws or regulation may require us to keep records for a longer period of time. In other cases, records are retained in order to fulfil our contractual or statutory obligations or to resolve queries or disputes which arise from time to time.

Should you become employed by FM, the Personal Information shared as a candidate will be stored and continue to be processed by FM pursuant to applicable law and regulation. More information can be found in the FM Employee Privacy Statement which will be provided to you as a new employee.

## **FM ACCESS TO PERSONAL INFORMATION**

Only limited authorized personnel within FM such as Human Resources, Legal, and certain authorized managers, will receive access to your Personal Information when appropriate in connection with their job responsibilities or the Recruitment Activities.

## **SOURCES OF PERSONAL INFORMATION**

While the Personal Information we collect may come directly from you, it may also be provided by our affiliates or other third parties. This may include third parties such as recruitment agencies, background screening providers and skills assessment providers engaged by FM in connection with Recruitment Activities.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

Where necessary so that we can manage our Recruitment Activities, we will share your information with our service providers and professional advisers (e.g. recruitment agencies, providers who carry out background checks on our behalf, and suppliers who run skills assessment programs for us). We may also contact third parties whose details you have provided so that we can verify information you have supplied in relation to your previous employment and qualifications. Otherwise we will not share your information with any third party unless:

- we are required to do so by law;
- this is necessary so that we can enforce our terms of use, rights or property or the rights or property of any third party; or
- this is necessary in connection with the sale of our business or its assets (in which case your details will be disclosed to our advisers and any prospective purchaser's advisers and will be passed to the new owners).

## **TRANSFER OF YOUR PERSONAL INFORMATION ACROSS BORDERS**

Due to the global nature of our business, the Personal Information FM collects may be transferred, processed and stored across geographical borders. For instance, we may transfer Personal Information locally or overseas, including to Australia, Brazil, Canada, the European Economic Area, Mexico,

Singapore, Switzerland, the United Kingdom, and the United States, and other locations where we have business operations and where our data processing agents may perform duties for us.

Like most international businesses, we centralize certain aspects of our data processing and human resources administration in our Corporate Head Offices located in the United States in order to allow us to better manage our business.

Whether to third parties or internally, any transfers of Personal Information from the European Economic Area to countries not automatically deemed to provide an adequate level of data protection are governed by European Union (EU) standard contractual clauses and/or equivalent data transfer regulations to protect the security and confidentiality of Personal Information.

Whether to third parties or internally, as regards any transfers of Personal Information from other jurisdictions outside the European Economic Area to countries not automatically deemed to provide a standard of data protection that is deemed to be adequate or comparable to protection in the jurisdiction in which the Personal Information was originally collected, we will, where required by local law, obtain your prior consent to such cross-border transfers or otherwise we will take such other steps as are required by local law to protect the security and confidentiality of Personal Information.

We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Notice.

## **PROTECTION OF YOUR INFORMATION**

FM has implemented reasonable physical, technical and administrative security standards to protect Personal Information from loss, misuse, alteration, destruction or damage.

## **ACCURACY OF YOUR INFORMATION**

FM takes reasonable steps to keep your Personal Information accurate and complete. In order to assist us with this, you should notify us of any changes to your Personal Information by amending the information provided on the web-based recruitment platform or contacting FM Human Resources at [globalhire@fm.com](mailto:globalhire@fm.com).

## **YOUR RIGHTS**

Subject to applicable law, you may have the following rights in respect of your Personal Information:

- obtain a copy of your Personal Information together with information about how and on what basis that Personal Information is processed;
- rectify inaccurate Personal Information (including the right to have incomplete Personal Information completed);
- erase your Personal Information in limited circumstances where it is no longer necessary in relation to the purposes for which it was collected or processed;
- restrict processing where the accuracy of the Personal Information is contested, the processing is unlawful but you object to the erasure of the Personal Information, FM no longer requires the Personal Information but it is required for the establishment, exercise or defense of a legal claim;
- lodge a complaint with the supervisory authority.

## **CONTACT US**

For further information regarding this Notice or to exercise your rights please contact the FM Data Protection team at [dataprotection@fm.com](mailto:dataprotection@fm.com) or FM Human Resources at [globalhire@fm.com](mailto:globalhire@fm.com).

This Notice was last updated April 2025.