

Candidate Privacy Notice

As part of our candidate application and recruitment process Genuine Parts Company, its parent and its subsidiaries and affiliates (collectively “**GPC**”) collect, process and store Personal Data about you. Personal Data shall have the meaning prescribed in the General Data Protection Regulation (“**GDPR**”). We will only use your personal data where we are permitted to do so by applicable law (“**Applicable Law**”)

The controller of your Personal Data is the hiring GPC subsidiary or affiliate. References to “GPC”, “GTC”, “Global Technology Center”, “we”, “us” and “our” will mean the hiring GPC affiliate. This means the hiring entity is responsible for deciding how we hold and use Personal Data about you. If you are unsure which GPC affiliate controls your Personal Data, please contact the Data Protection Officer and the Privacy Team using the details set out below. We process this information for a range of purposes relating to the recruitment process and this may include your application, assessment, pre-employment screening and your work permission. This document sets out:

- Why we collect your Personal Data
- What information is collected and
- How it is processed within the recruitment process

Throughout this Privacy Notice we use the term “processing” to cover all activities involving your Personal Data, including collecting, handling, storing, sharing, accessing, using, transferring, and disposing of the information.

Why we collect your Personal Data?

To manage your application, we need to process certain Personal Data about you. The purposes for this are set out below. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements, so not all the purposes set out below will apply to you all the time.

Where this is necessary for GPC’s legitimate interests, as defined in the GDPR:

- Protecting GPC’s legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
- Maintaining the security and integrity of GPC’s facilities, equipment, and electronic platforms. This includes administering access rights, monitoring compliance with company protocols, and, where permitted by Applicable Law and in accordance with relevant policies, for investigations and disciplinary actions.
- To justify processing of your Personal Data based on our legitimate interests, where required. GPC conducts balancing tests for the data processing it carries out based on its legitimate interests. You can obtain information on our balancing tests by contacting us using the details set out at the end in this Notice.

Where necessary to comply with a legal obligation:

- Disclosures to law enforcement agencies or in connection with legal claims, or regulatory purposes (including disclosure of such information in connection with legal process or litigation).

Where necessary for the purposes of carrying out obligations in the field of employment and social security and social protection law under Applicable Law (including, as applicable, under Art. 9 (2)(b) of the GDPR):

- Information revealing race, ethnic origin, sexual orientation, and any disability may be processed to facilitate effective equal opportunities monitoring and/or to comply with legal obligations to make reasonable adjustments.

Where you have given consent:

- For example, when required, GPC shall ask for your permission to conduct a criminal background check, financial background check and personal reference check, if such a check is allowed under Applicable Law.
- For example, to store your application in our database for the specified period of time after the end of the recruitment process in order to contact if we see that application may be a good fit for a job role we want to offer.

What kind of information we hold about you?

Here are the categories of Personal Data we may process:

- Personal details such as contact information, name, address, phone/mobile number, email address, date and place of birth
- Recruitment information, such as cover letter, resume, areas of interest
- Work history/job data: previous employers, positions, dates etc
- Compensation: basic salary, benefits, bonuses etc
- Education and work history including professional qualifications and skills
- Employer feedback / references to include regulated references where necessary
- National /visa/ right to work permit information (e.g. passport, driving license, Social Security or National Insurance numbers)
- Photographs and images from recorded assessments or from onsite CCTV
- Results of pre-employment screening checks (e.g. credit history, criminal records checks where permitted under local law)
- Assessment results (e.g. psychometrics assessment results, results video or telephone assessment)

We will not ask you to provide any Personal data that collection is prohibited under Applicable Law.

Our processing of the above categories of Personal Data is required to enable GPC to manage the recruiting process, manage your application, organize interviews, to engage with you about GPC career opportunities, and for other arrangements required by our hiring and decision-making process.

If you fail to provide us with the necessary information, we request to consider your application (such as evidence of qualification and work history), we may not be able to process your application.

We may also process the above categories of Personal Data when we consider it necessary for complying with laws and regulations, including collecting and disclosing Personal Data as

required by applicable laws, or to exercise or defend the legal rights of GPC, protect your or third parties' property from damage, and protect your safety and that of other parties.

During the process we also capture some sensitive personal data about you (e.g. disability information). We do this to make reasonable adjustment to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment and to ensure that we comply with regulatory obligations placed on us about our hiring.

What are the sources of the Personal Data you receive about me?

GPC may process the following types of Personal Data when you apply for a position with us:

- Data you provide to us: GPC collects and stores any data you provide us through your application, including your contact details; your application materials (CV, resume, cover letter, previous work experience, education, and our notes from any interviews with you); your desired location; type of employment sought and date available; your identification documents (passport number, government identification numbers where permitted, immigration status); and any other data you submit to us, including any correspondences you may have with us during the application process
- Data from other sources: GPC may obtain data about you from other sources, including recruiters, employment research firms, identity verification services, the references you provide to us, websites and other publicly accessible data on the internet. We will also receive data you submit to us through third-party websites to the extent it is allowed under Applicable Law.
- Information we collect automatically: when you make an application through GPC's careers webpage, GPC may collect information sent to us by your device. For example, this includes the pages you access, your computer IP address, device identifiers, the type of operating system you are using, your location, mobile network information, cookies, standard web log data and other information, your browser type, and traffic to and from our site.

With whom do we share your Personal Data?

GPC may need to share your Personal Data internally (both in the country where you may work and in other countries in which we have central operations) and may require sharing it with some external parties or associates of GPC. Some of these third parties and associates may be located outside the European Economic Area ("EEA"), or your home jurisdiction. As a result, Personal Data may be collected, used, processed, stored, or disclosed in the United States of America, and in some cases, other countries. Personal Data is only transferred to another country if this is permitted under the applicable privacy legislation. If you are resident in the EEA, we will only transfer your Personal Data to countries with a standard of data protection deemed adequate by the European Commission. If you are a resident of another country with cross border transfer restrictions, we will transfer the data in accordance with Applicable Law.

If you wish to enquire further about the safeguards used, please contact us via email: careers_pl@genpt.com. Your information will only be shared if it is necessary or required.

The recruitment process will involve:

- Assessing and processing your application
- Assessing your suitability (skills, strengths, behaviors for the role) and
- Activities needed to complete the onboarding and screening process should your application be successful.

To enable these processes your Personal Data may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your Personal Data may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf
- Employees in HR who have responsibility for certain HR processes (for example recruitment, assessment, pre-employment screening)
- Employees in Legal, Compliance Audit and HR with responsibility for investigating issues of non-compliance with laws and regulations, policies, and contractual requirements
- Employees in IT and system owners who manage user access
- Security managers for facilities / premises

GPC may also need to share your information with certain external third parties including:

- Companies who provide interview and assessment services to GPC
- Suppliers who undertake background screening on behalf of GPC
- Academic institutions in validating information you've provided
- Other third-party suppliers (or potential suppliers) who provide services on our behalf

How do we protect your information

Our HR and recruitment systems use physical, technical, and procedural safeguards that are appropriate to the sensitivity of the Personal Data. These safeguards are designed to protect your Personal Data from accidental or unlawful destructions, loss, access, use, modification, or damage.

GPC endeavors to use Personal Data that is up-to-date and accurate. Where GPC is made aware that the applicant Personal Data it maintains is inaccurate, reasonable measures are taken to rectify the data.

Where we share information with other parties located outside your country, as a minimum, GPC will require that such Personal Data is protected as required by the laws of the country where you work. GPC also requires its third-party suppliers or recipients of Personal Data to guarantee the level of protection required by applicable law.

Screening checks

As part of the selection process, GPC performs several screening checks, where permitted by Applicable Law. These checks are only performed on candidates who have been selected for a role. Your consent will be required before screening checks are performed.

Retention

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or report requirements. To determine the appropriate retention period of Candidate Data, GPC considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your Candidate Data, the purpose for which GPC processes your Candidate Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

After an unsuccessful application, GPC will aim to keep some or all your personal data to the extent we need to for a period of 6 months after the last activity to consider you for any other job openings across GPC and for legal/record keeping purposes, unless GPC is required to keep your data for a longer period by Applicable Law.

Consent to keep your information

GPC has asked you to consent to GPC storing your Candidate Data after that initial period. Where you have given GPC your consent, GPC applies the following retention guidelines to your Candidate Data:

- After 6 months of no activity, GPC will minimize your Personal Data but at a minimum will retain your CV and information contained in it.
- Within two years of no activity, GPC will aim to contact you to understand whether there are any roles at GPC which may be suitable for you. GPC may also contact you at any point up to this period, if GPC considers having a potential suitable position for you and if you have opted in to receive any information generally about our recruitment campaigns.
- If GPC does not hear from you, GPC will delete your profile.

You may withdraw your consent to GPC retaining your Candidate Data beyond the initial 6 months period after an unsuccessful application at any time, by writing email to: careers_pl@genpt.com

If you do not consent to the retention of your data as set out here or you withdraw your consent, after 6 months of no activity or 6 months from an unsuccessful application (unless GPC is required to keep your data for a longer period by law), GPC will delete your profile.

Direct Marketing

GPC will not use Candidate Data to offer you any products or services for personal or family consumption or provide Candidate Data to third parties for their direct marketing. These restrictions do not apply to contact or other personal data obtained in the context of a customer, consumer, or other non-employment relationship with GPC.

Changes to this Notice

GPC reserves the right to modify this Notice by posting changes to relevant GPC websites. If you submit additional Candidate Data or request to be considered for a GPC position following the effective date of a modified Notice, your Candidate Data will be handled in accordance with the Notice in effect at that time.