

RECRUITMENT PRIVACY NOTICE

1. Introduction and Scope

- 1.1 Triland Metals Limited has issued this Recruitment Privacy Notice for those applying to be employees and other workers at Triland. For the purpose of this Notice, other workers shall include non-executive directors, workers (including temporary and agency workers), secondees, interns, independent contractors and consultants, professional advisors, other third parties applying to Triland to carry out work for us. This categorisation is for convenience and does not demonstrate any particular status.
- 1.2 The term "**applicants**" is used in this Notice to refer to anyone who applies for a job role, or who otherwise seeks to carry out work with or for Triland (whether on a permanent or non-permanent basis).
- 1.3 This Notice sets out the personal information that we collect and process about you, the purposes of the processing and the rights that you have in connection with it. Triland's other rules, policies and procedures set out ways in which you should use and process personal information in relation to others and with which you must comply. You should also bear in mind and act in accordance with the details and principles set out in this Notice when undertaking such processing.
- 1.4 We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. If you are in any doubt regarding the applicable standards, or have any comments or questions about this Notice, please contact us using the contact details further below. This Notice will be regularly reviewed and updated and it is your responsibility to ensure you are familiar, and act in accordance with, it.

2. Types of personal information we collect about applicants

- 2.1 In the course of you applying to work at Triland, we may process personal information about you and your dependents, beneficiaries and other individuals whose personal information has been provided to us.
- 2.2 The types of personal information we process includes, but is not limited to:
- (a) Identification data and contact details – including your name, address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)).
 - (b) Employment history – such as previous employers and job titles/positions.
 - (c) Information on professional qualifications, achievements and/or skills, for example, academic/professional qualifications, education, CV/resume and languages spoken. This will also include any authorisations required in respect of your work, for example, evidence that you hold a particular category of driving licence, Disclosure and Barring Service ("**DBS**") (or equivalent) checking applications and responses and/or membership of a particular professional body.
 - (d) Background information – such as academic/professional qualifications, job qualifications, education, details included in your CV/résumé (which might include details of any memberships or interests constituting sensitive personal information), transcripts and employment references.
 - (e) Details of your nominated referees (including their name, contact details, employer and job role).
 - (f) Details of your immigration/visa status.

- (g) Previous applications/roles (information relating to previous applications you have made to the Company's Group and/or any previous employment history with the Company's Group).
- (h) Other information you voluntarily provide throughout the process, including through assessment centres / exercises and interviews.
- (i) Information relating to any professional licences, authorisations and/or approvals, for example, registration and other information concerning regulatory approval under the rules of the Financial Conduct Authority ("FCA") or registrations with any other professional or regulatory body.

2.3 As a general rule, during the recruitment process, we try not to collect or process any of the following: information that reveals your racial or ethnic origin, religious, political or philosophical beliefs or trade union membership; genetic data; biometric data for the purposes of unique identification; or information concerning your health/sex life ("**Sensitive Personal Information**"), unless authorised by law or where necessary to comply with applicable laws.

- (a) However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate recruitment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring (on the basis that it is in the public interest and in accordance with applicable law), to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider accommodations for the recruitment process and/or subsequent job role. You may provide, on a voluntary basis, other Sensitive Personal Information during the recruitment process.

3. Sources of personal information

3.1 Usually you will have provided the information we hold about you but there may be situations where we collect personal information or sensitive personal information from other sources. The following are the types of information we may collect about you and the source of the information:

- (a) information about any "live" criminal proceedings, collected from the DBS and/or equivalent criminal records checking bodies;
- (b) information about your previous employment (including your employment record) and other information about your suitability to work at Triland from any referee provided by you;
- (c) information about your health, including your fitness to carry out work and/or any accommodations or adjustments to be considered from your GP, other specialist medical adviser or Triland's appointed medical expert;
- (d) information from any regulatory body governing the sector or sectors in which Triland operates;
- (e) certain publically available information from public sources (including the internet);
- (f) information collected during the application and recruitment process which may be received via an employment agency, background check provider and/or credit reference agency.

4. Purposes for processing personal information

4.1 We collect and use this personal information primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying our reference checks or background checks (where applicable) and to manage the hiring process generally and communicate with you about it.

4.2 If you are accepted for a role at Triland, the information collected during the recruitment process will form part of your ongoing staff member record and will be processed in accordance with our Employee Privacy Notice.

4.3 If you are not successful, we may still keep your application to allow us to consider you for other suitable openings within Triland in the future unless you request that we delete your application. Your application will also be retained for a period in case of any disputes arising out of the recruitment process.

5. Who we share your personal information with

5.1 Triland takes care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this notice and that the confidentiality and integrity of the information is maintained.

5.2 We will share your personal information with other members of Triland's group of companies around the world to administer our recruitment processes and store data.

5.3 We make certain personal information available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data privacy law. For example, some personal information will be available to third party companies who provide us with services such as: recruitment or executive search agencies involved in your recruitment, HR and other data systems and storage, legal, financial and other advice, employee travel management, expenses reporting, general software/IT troubleshooting, occupational health advisers, background checking or other screening providers and relevant local criminal records checking agencies including the DBS (or equivalent criminal records checking agencies) and our insurance providers or their appointed agents.

5.4 We may also disclose personal information to other third parties on other lawful grounds, including:

- (a) to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, or to meet national security or law enforcement requests, including, but not limited to, a court order or search warrant. Examples might include where information on you is requested by the Information Commissioner's Office (or equivalent data protection authority), the Health and Safety Executive, or where a report is necessary to the police;
- (b) with your consent;
- (c) as necessary to establish, exercise or defend against potential, threatened or actual litigation (for example, if a former colleague names you in connection with an tribunal or court proceedings concerning Triland);
- (d) where necessary to protect the vital interests of you or another person (for example, if you are incapacitated and we need to arrange for emergency medical treatment); and
- (e) in connection with the sale, assignment or other transfer of all or part of our business.

6. Transfer of your personal information outside of the United Kingdom

6.1 Triland is part of a global group of companies headquartered in Japan. As the group operates at a global level, we may need to transfer personal information to other countries where we operate (such

as information on relevant experience you may have for a particular job or secondment or information hosted on a shared HR system).

- 6.2 Triland does not, as a general rule, export or transfer your personal information to third parties based outside of the United Kingdom. Data storage of Triland's HR system is local and no remote access is permitted.
- 6.3 Triland may use cloud-based and other technologies which may be located and/or hosted in data centers outside of the United Kingdom. Any transfer of personal data to such data centers shall be made in accordance with this paragraph 6.
- 6.4 Whenever we transfer your personal data out of the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- (a) We may transfer your personal data to countries that have been approved by regulations and satisfied the data protection test.
 - (b) Where we use certain service providers, we may use standard data protection clauses.
 - (c) Where we use providers based in the US, we may transfer data to them pursuant to the UK-US Data Bridge, provided that they are a participating organisation under the framework and opted in to the UK extension.

7. Data retention periods

- 7.1 Personal information will be stored only as long as is necessary to carry out the purposes described in this Notice or as otherwise required by contractual agreements with third parties, the law, regulation or other Triland policies.
- 7.2 Details of retention periods for different aspects of your personal data are available upon request; please contact us via email or post using the contact details set out at paragraph 10 of this Notice.

8. Your data protection rights

- 8.1 You have a number of data subject rights under applicable data protection law, including the right to request:
- (a) **Access** - You can receive information about how we process your personal data and a copy of such personal data. This is commonly known as a "data subject access request".
 - (b) **Rectification** - You can require us to correct your personal data, where you consider it to be inaccurate or incomplete.
 - (c) **Erasure** - You can require the deletion of your personal data, to the extent permitted by law.
 - (d) **Restriction** - You can request the restriction of the processing of your personal data.
 - (e) **Objection** - You may object to the processing of your personal data on grounds relating to your particular situation. In the case of direct marketing, we will immediately cease further processing if we receive your objection.
 - (f) **Transfer** - Where legally applicable, you can require us to transfer (or have returned) your personal data where technically feasible.
 - (g) **Consent withdrawal** - You have the right to withdraw your consent at any time.

- 8.2 Triland will be the data controller in respect of the personal information referred to in this policy. If you have any questions about your data subject rights or wish to make a request to exercise them in relation to personal information referred to in this Notice, you should make a request (where possible, clearly labelled as such) in writing to the Data Security Officer as set out at paragraph 10 of this Notice. For access requests to data relating to employment matters, you should also copy in your request to the Head of Human Resources, Nicola Robertson by email to nicola.robertson@triland.com or by post to the address stated at paragraph 10.
- 8.3 You should note that there are a number of exceptions, exemptions, restrictions and qualifications in relation to the data subject rights described above, for example:
- (a) Triland may request identification documents to verify that the request is made by you or on your behalf;
 - (b) Triland may decline to act on any request which is deemed excessive and/or manifestly unfounded (for example, where repeated requests have been made). If Triland is prepared to act on such a request anyway, it may charge a reasonable fee; and/or
 - (c) where a request is particularly complex, Triland may be unable to respond fully within the usual applicable time limit and may need to extend the time period.
- 8.4 There are other specific exemptions and limitations which relate to the data subject rights. Triland will seek to engage with you to discuss any exceptions, exemptions, restrictions and qualifications after any request is made and if it considers that they apply in the circumstances.
- 8.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- 8.6 If you receive a data subject rights request from an individual, you should forward it securely and as soon as possible to the person identified above by using the contact details set out above.

9. Updates to this notice

This notice may be updated periodically to reflect any necessary changes in our privacy practices. You have a responsibility to ensure that you regularly review this notice and we shall indicate at the bottom of the notice when it was most recently reviewed.

10. Questions and comments

Triland is the controller and responsible for your personal data. Triland's compliance team and Data Security Officer are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

CONTACT DETAILS

Company name: Triland Metals Limited
Data Security Officer: David Cumming
Email address: dataprotection@triland.com
Postal address: MidCity Place, 71 High Holborn, London WC1V 6BA, United

Kingdom
Telephone number: +44 (0)20 7061 5568

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the United Kingdom ("UK") supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

TRILAND METALS LIMITED