



Privacy Notice

Job Applicants & Candidates

Version 1.0



Contents

1	Purpose and scope	3
2	Who are we?	3
3	What information do we collect about you?	3
4	How is your personal information collected?	4
5	Why do we need to collect and use your personal information?	4
6	Monitoring	5
7	Who do we share your personal information with?	6
8	How do we keep your personal information secure?	8
9	How long will we keep your personal information?	8
10	Your rights	8
11	Changes to this Privacy Notice	9
12	Contact	9
13	Making a complaint	9
	SCHEDULE	10
14	Document Control	10



1 Purpose and scope

Johnson Matthey respects your privacy and is committed to protecting your personal information.

Please read this Privacy Notice carefully as it contains important information about how and why Johnson Matthey collects and uses personal information about you, your rights in relation to your personal information, and how to contact us and the relevant supervisory authority if you have any questions or wish to make a complaint regarding the handling of your personal information.

This Privacy Notice applies to any individual that pursues employment (or other service) opportunities with Johnson Matthey, including job applicants and candidates. It does not form part of any employment contract or contract to provide services, and shall not be construed or interpreted as any commitment from us to enter into the said contracts with you.

Please note that there may be additional guidance issued in the country in which you pursue employment (or other service) opportunities. This Privacy Notice shall only apply to the extent that it is consistent with that local guidance.

2 Who are we?

This Privacy Notice is issued on behalf of Johnson Matthey Saudi Arabia (hereinafter “**Johnson Matthey**”, “**JM**”, “**we**”, “**us**” or “**our**”).

For the purposes of applicable data protection laws (including the Personal Data Protection Law, (“PDPL”) applicable in the Kingdom of Saudi Arabia, KSA), we are the ‘Controller’ of your personal data.

Our contact details are provided in the contact section below.

Our Principles

The following principles apply wherever and whenever we process personal information:

- We will only process personal information when we obtain your consent, have a legitimate business reason, or need to satisfy a legal requirement for doing so.
- We will be open and transparent with people about the way we use their information.
- We will only use personal information for the purpose for which we collected it, unless we have the individual’s consent to use it for a new purpose, or if we have a legitimate basis to do so.
- We will only collect the amount of personal information that we need for the specified purpose.
- We will take steps to ensure that any personal information we collect is accurate and kept up to date.
- We will not keep personal information for longer than we need it.
- We will keep personal information secure and limit the people who can access it.
- We will ensure that any third party we share personal information with will also take appropriate steps to protect it.

3 What information do we collect about you?

“Personal data” means ‘Any statement, regardless of its source or form, that would lead to the identification of the individual specifically, or make it possible to identify him directly or indirectly, including: name, personal identification number, addresses, contact numbers, license numbers, registers, personal property, bank account



and credit card numbers, fixed or moving photos of the individual, and other personal data’.

"Sensitive personal information" means 'Any personal statement that includes a reference to an individual's ethnic or tribal origin, religious, intellectual or political belief, or indicates his membership in associations or civil institutions. As well as criminal and security data, biometric data that identifies you, genetic data, credit data, health data, location data, and data indicating that the individual is of unknown parentage or one of them’.

We may collect, store, use, process, transfer, provide, disclose, and delete the following types of personal information about you. To the extent feasible, we highlight in **bold and underline** the sensitive personal information that we collect and process for your special attention.

- Identifying information, including name, **passport** or national id
- Contact information, including personal and business email and postal addresses and telephone numbers;
- Authentication information enabling access to and use of our buildings, including user profiles, **CCTV footage**
- Recruitment information, including race, ethnic or tribal origin, nationality or any information provided in a CV, application form or cover letter, information provided to us during interviews and assessments, records of qualifications, skills and training.
- Reference check information – feedback relating to criminal record and credit history

4 How is your personal information collected?

We collect personal information about you through the recruitment process.

We may collect personal information directly from you, or from third parties such employment agencies or an established Employer of Record (EOR)

5 Why do we need to collect and use your personal information?

Data protection legislation requires that we have **your consent** to process your personal information. In most cases, we will use your personal information including **sensitive personal information** where you have given us your **explicit consent**, or in the following circumstances:

- where it is necessary to conclude or perform the contract we have with you;
- where it is necessary to conduct human resources management as per employment regulations and collective contracts formulated and/or concluded in accordance with applicable laws and regulations;
- where the sole alternative legal basis that is likely to apply in an employment context is that the processing is being conducted pursuant to another law or in connection with the performance of an existing agreement with the data subject (i.e. an employment agreement).

or in the following circumstances:

- where it is necessary to respond to an unexpected public health incident or, in an emergency, to protect the lives, health, or property of natural persons;
- where it is done in the public interest for purposes such as providing news reports and monitoring public opinion, and the extent of the processing is reasonable;
- the personal information has been made public by you or has otherwise been lawfully made public, and we will conduct reasonable processing of your personal information to the extent permissible under applicable laws and regulations; or
- where it is necessary for other legitimate interests in accordance with applicable laws and regulations.

Please note that we may have more than one purpose to justify our use of your personal information.



We use your personal information we collect to:

- assess your skills, qualifications, and suitability for the work/role;
- carry out background and reference checks, where applicable and permitted by local laws;
- communicate with you about the recruitment process;
- decide whether to enter into a contract of employment (or other service) with you;
- keep records relating to our hiring processes; and
- comply with legal or regulatory requirements.

For clarity, we have identified in the SCHEDULE below the types of personal information used for each purpose.

If you fail to provide certain information when requested, we may not be able to proceed with the recruitment process, or we may be prevented from complying with our legal obligations.

Change of Purpose

We will only use your personal information for the purpose for which we collected it. If we need to use your personal information for other purposes, we will notify you and we will explain the lawful basis which allows us to do so or seek consent from you at the point of collection.

Sensitive personal information

Sensitive personal information requires higher levels of protection. We commit to collecting your sensitive personal information on a strictly-needed basis. We will ensure that sensitive personal information to be collected is sufficiently necessary to achieve the purposes stated in the SCHEDULE below, sensitive personal information will be processed in such way of having the least impact on your rights and interests, and proper security measures will be put in place to protect data security. **You acknowledge and agree that we may collect and process your sensitive personal information for the purposes stated in this Privacy Notice. Where applicable laws and regulations require any additional voluntary and specific consents from you in the collection of sensitive personal information, we commit to seeking additional consents from you at the point of collection.**

Automated decision making

We do not envisage that any decisions will be taken about you using only automated means, however we will notify you in writing if this position changes.

6 Monitoring

CCTV

We deploy CCTV at JM sites to enhance the security of our property, to protect the people who work at these sites, and to comply with applicable legal obligations. CCTV will be monitored for security and safety reasons and used in the event of an emergency, an investigation into alleged criminal or non-compliance, or for the purpose of complying with applicable laws and regulations. **Where applicable laws and regulations require any additional voluntary and specific consents from you in the collection of personal information through CCTV, we commit to seeking additional standalone consents from you at the point of collection.**

Prevention and detection of crime

In the rare event that we have reasonable grounds for suspecting criminal activity or that another serious offence has been committed, we may, subject to local laws, carry out monitoring without the individual being aware that it is taking place. Any such monitoring may involve any of the electronic, video or audio systems or use of any other information JM may lawfully have about the individual. Such monitoring is only used as part of



a specific investigation and must first be the subject of a personal information protection security impact assessment.

Legal Basis

The legal basis for such monitoring is stated in Section 5 of this Privacy Notice, where the applicable laws and regulations do not require JM to obtain individuals' explicit consent to such monitoring in certain circumstances.

Access to any personal information collected as a result of such monitoring will be strictly controlled. The use of the information for investigation purposes will be the subject of a personal information protection security impact assessment carried out in accordance with the applicable laws and regulations.

7 Who do we share your personal information with?

We will share your personal information with other parties where it is necessary to administer your recruitment, or where required by law.

We may share your personal information with entities within the Johnson Matthey Group and third-party service providers as **Processors**, and other entities as **Controllers**. To view this information, please refer to this link [KSA 3rd Parties](#)

- **Entities within the Johnson Matthey Group as processors**
 - to administer your recruitment; and
 - as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and/or for system maintenance support and hosting of data.
- **Third party service provider as processors**
 - to administer your recruitment; and
 - to provide off-site data storage.
- **Third party service provider as controllers**
 - Registered address/email of Data Protection Officer/other contact details as appropriate.
 - to administer your recruitment; and
 - Personal information to be shared with the controller may include identifying information, contact information, authentication information and recruitment information.

You acknowledge and agree that we may share your personal information with other Controllers and Processors for the purposes stated and in accordance with this Privacy Notice. Where applicable laws and regulations require any additional voluntary and specific consents from you with respect to the sharing of your personal information with another Controller or Processor, we commit to seeking additional standalone consents from you at the appropriate time.

Third Parties permitted by law. In certain circumstances, we may be required to share your personal information with **law enforcement or other authorities** to comply with a legal or regulatory obligation.

Third Parties in the context of a sale of some or all of JM's business. In the context of a merger or sale of some or all of JM's business, demerger, dissolution, or declaration of bankruptcy, we may share your personal information with relevant third parties. In those circumstances the personal information will be subject to confidentiality agreements. We will take reasonable steps to ensure that your personal information is kept secure and treated in accordance with this Privacy Notice and applicable data protection laws, including, where relevant, by agreeing appropriate contractual terms with the receiving party. Where applicable laws and



regulations require any notification to you with respect to the name and contact details of the receiving party, we commit to notifying you at the appropriate time.

International Transfers

Your personal information may be remotely accessible by, or transferred to and stored at the entities ("**Foreign Recipients**") outside the Kingdom of Saudi Arabia. To view this information, please refer to this link [KSA 3rd Parties](#)

- **Johnson Matthey Plc ("Johnson Matthey Headquarter") as a processor**
 - Registered address: [5th Floor, 25 Farringdon Street, EC4A 4AB]
 - Email of Data Protection Officer: [DPO@matthey.com]
 - Personal information to be remotely accessed, transferred, stored on a needed basis includes: identifying information, contact information, authentication and recruitment information
 - Purposes of cross-border data sharing: to administer your recruitment; as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and/or for system maintenance support and hosting of data.
- **Third party service provider as a processor**
 - Registered address/email of Data Protection Officer/other contact details as appropriate
 - Personal information to be remotely accessed, transferred, stored on a needed basis includes: identifying information, contact information, authentication information and recruitment information
 - Purposes of cross-border data sharing: to engage as a processor, to administer your recruitment; as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and/or for system maintenance support and hosting of data.
- **Third party service provider as a controller**
 - Registered address/email of Data Protection Officer/other contact details as appropriate
 - Personal information to be remotely accessed, transferred, stored on a needed basis includes: identifying information, contact information, authentication information, recruitment information, and workforce administration information
 - Purposes of cross-border data sharing: as controller, to administer your recruitment; as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and/or for system maintenance support and hosting of data.

As we operate globally we have adopted common data handling and information security policies and we transfer your personal information with safeguards, which ensure an adequate level of data protection as required by the PDPL, and include the standard contractual clauses (as amended and/or replaced from time to time) as required under the applicable laws and regulations.

These arrangements allow for the lawful and secure transfer of your personal information regardless of the country of location, unless otherwise provided by applicable laws and regulations.

You acknowledge and agree that we may share your personal information with the Foreign Recipients for the purposes stated and in accordance with this Privacy Notice. Where applicable

Privacy Notice: Job Applicants & Candidates Version 1.0



laws and regulations require any additional voluntary and specific consents from you with respect to the cross-border sharing/access of your personal information, we commit to seeking additional standalone consents from you at the appropriate time.

8 How do we keep your personal information secure?

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your personal information to those employees, agents, workers, contractors and third parties who have a business need to know it. As part of our security measures, we may sometimes require you to give proof of your identity before we disclose personal information to you. Information about the information security standards we use to protect your personal information can be found in our **Information Security Policy**

We regularly monitor our systems for possible vulnerabilities and attacks and carry out tests to identify ways to further strengthen security. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Third party processors

Where we engage third parties as processor to process your personal information on our behalf, we only provide the information they require to perform their specific service. We ensure that they keep your information secure by checking that their security measures are adequate and by entering into agreements with them which specify that they must only process personal information on our behalf, and according to our instructions as well as the purpose and approach of processing activities among others provided in the agreements.

9 How long will we keep your personal information?

Subject to applicable laws and regulations, we will only retain your personal information for as long as we need it to fulfil the purposes we collected it for and up to **two years** after we have communicated to you our recruitment decision, 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. Notwithstanding the fact that we will process your personal information for the time strictly necessary to achieve the purpose in question, we will subsequently keep them duly stored and protected for the time during which liability may arise for their processing, in compliance with applicable laws and regulations. Once each of the potential actions is time-barred we will proceed to delete or anonymise the personal information.

10 Your rights

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please inform us if your personal information changes during your recruitment process.

An overview of your rights

Under the PDPL, you have the right to:

- request details or copies of the personal information we hold about you;



- request to have your personal information corrected if it is inaccurate or out of date, and completed if it is incomplete;
- in certain circumstances, object to or restrict the processing of your personal information;
- in certain circumstances, request to have your personal information deleted or removed; and
- in certain circumstances, request to have your personal information transferred to a third party.

You can contact us (see contact section below) to obtain further information on each of these rights, including the circumstances in which they apply.

Your right to withdraw consent

Whenever we are relying on the consent you have given us to use your personal information, you have the right to change your mind and withdraw that consent.

11 Changes to this Privacy Notice

We will review and may update this Privacy Notice from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any significant changes as soon as reasonably practical. We may also notify you in other ways from time to time about the processing of your personal information.

This Privacy Notice was last updated on: 07/03/24

12 Contact

If you have any questions or concerns about the way we treat your personal information, any questions about your rights in relation to your information, or if you would like to request a copy of the personal information we hold about you, please contact our local JM KSA representative the first instance.

Address
General Manager
Johnson Matthey Arabia for Business Services LLC

Tel tbc

Email Salik.Khawaja@matthey.com

You may also contact the **Global Data Protection Officer**, the designated Data Protection Officer for the Johnson Matthey Group, with any queries you may have.

Address Global Data Protection Officer
Johnson Matthey Plc
5th Floor, 25 Farringdon Street EC4A 4AB

Tel +44 20 7269 8400

Email DPO@matthey.com

13 Making a complaint

If you wish to make a formal complaint about the way your personal information is handled which cannot be resolved locally, please contact the **Global Data Protection Officer** at DPO@matthey.com. Should you wish to escalate your concerns, you have the right to lodge a complaint with your local data protection authority.



SCHEDULE

Purposes for which we need your personal information, with examples <i>Please note these examples are illustrative and non-exhaustive</i>	Types of personal information processed <i>Sensitive personal information referred to as "SPI" and highlighted in <u>SPI: Health - disability; race or ethnic and tribal origin origin; nationality</u></i>
Application <ul style="list-style-type: none"> Communication about the recruitment process 	Identifying information Contact information Recruitment information <u>SPI: Health - disability; race or ethnic and tribal origin origin; nationality</u>
Screening <ul style="list-style-type: none"> Background and reference checks 	Identifying information Contact information Recruitment information Workforce administration information <u>SPI: Health - disability; race or ethnic and tribal origin; criminal check</u>
Assessment / Rejections or Offers <ul style="list-style-type: none"> Interviewing Assessment of skills, qualifications, and suitability for the work/role Decide whether to enter into an employment contract (or other service) 	Identifying information Contact information Authentication information Recruitment information Workforce administration information <u>SPI: Health - disability; race or ethnic and tribal origin; criminal check</u>
Documentation <ul style="list-style-type: none"> Keep records relating to the recruitment processes 	Identifying information Contact information Recruitment information Workforce administration information Reference check documentation <u>SPI: Health - disability; race or ethnic and tribal origin; criminal check</u>

14 Document Control

Revision history

Version Number	Date of Publication	Reviewer/Author	Summary of Change
1.0	07/03/24	Caroline Burton	To comply with Saudia Arabia Data Protection Law (PDPL)



DECLARATION OF CONSENT

I have read, understood, and accepted the current Privacy Notice of Johnson Matthey. In light of this, I hereby provide the following declaration of consent.

- I have read and consented to the current Privacy Notice.
- I agree that my personal information can be shared with other 3rd parties as specified in the Privacy Notice.
- I agree to the cross-border transfer of my personal information as specified in the Privacy Notice.
- I agree that my sensitive personal information can be processed as specified in the Privacy Notice.

Name _____
Signature _____
Date _____