

March 2022

GOODMAN CONTINENTAL EUROPE GDPR PRIVACY NOTICE FOR APPLICANTS / CANDIDATES

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy notice applies if you are applying to work with Us (as defined hereinafter) (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) ("**GDPR**") and any other applicable local privacy and data protection legislation (the "**Applicable Laws**").

2. WHO IS IN CHARGE OF THE PROCESSING OF YOUR DATA?

The Continental European Goodman entity/entities for which you are applying for / which might be interested in you as a possible candidate (the "**Local Entities**" or "**Local Entity**") and Goodman Management Services (Belgium) NV, located in Belgium, ("**GMS**") (the Local Entities and GMS are hereinafter jointly referred to as the "**Companies**", "**We**", "**Our**", and "**Us**" and are listed more in detail in Schedule 1 at the bottom of this privacy notice) are committed to protecting the privacy and security of your personal data in accordance with the Applicable Laws.

GMS acts in a capacity of joint controller with the respective Local Entity, as they jointly determine the purposes and means of the processing of your recruitment personal data and will be jointly responsible for complying with the Applicable Laws in the context of your recruitment process. In compliance with Article 26 of the GDPR, the Companies have concluded separate arrangements where they determine in a transparent manner their respective responsibilities for compliance with the obligations under the Applicable Laws, in particular regarding the exercise of your rights.¹

The essence of these arrangements is that, since GMS has the HR expertise and HR team in house, GMS will initiate and manage the recruitment processing activities together with the respective Local Entity as a shared / centralised service.

GMS will act as your main point of contact for all recruitment, including the exercise of your rights with respect to your personal data (for more information on exercising your rights, see point 15).

3. DATA PROTECTION PRINCIPLES

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

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

¹ Please note that when you would be applying to work for GMS itself, no Local Entity is involved in the recruitment process and GMS shall act as sole data controller for the processing of your personal data and will be solely responsible for complying with the Applicable Laws.

- kept securely.

4. THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us, We will collect, store, and use the following categories of personal information about you:

- the information you have provided to us in your CV and covering letter (which may include details of current salary and expected salary);
- the information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications;
- any information you provide to us during an interview; and
- any results obtained through aptitude tests or other tests which you may do at our request in the course of the recruitment process.

We may also collect, store and use the following "special categories" of more sensitive personal information, within the limits of Applicable Laws:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; and
- information about criminal convictions and offences.

5. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- you, the candidate;
- recruitment agencies, from which We collect the following categories of data: name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, hobbies;
- background check providers (including former colleagues or parties you have worked with), from whom We may collect impressions of your past performance;
- your named referees, from whom We obtain a standard reference; and
- the following data from third parties from a publicly accessible source: social media profiles such as LinkedIn.

6. WHY WE WILL USE INFORMATION ABOUT YOU

We will use the personal information We collect about you to:

- assess your skills, qualifications, and suitability for the work;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to our hiring processes;
- as the case may be, stay in contact with you for future opportunities; and
- comply with legal or regulatory requirements.

We Process your Personal Data to decide whether to enter into a contract of employment or engagement with you. In other words, our legal basis is the performance of steps at your request prior to entering into a workforce contract.

Having received your CV and covering letter or your application form and the results from tests you

may have taken at our request, We will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. In this assessment, We might also take into account any reference checks or other checks that were performed. If you do meet our requirements, We will decide whether your application is strong enough to invite you for an interview. If We decide to call you for an interview, We will use the information you provide to us at the interview to decide whether to offer you the role.

In case you are not appointed for a certain role, We may keep personal data about you based on our legitimate interests for a period up to 2 years to contact you for new opportunities. If We want to continue to be able to contact you after these 2 years for new opportunities, We will ask for your consent.

After these 2 years, We will retain your first and last names based on our legitimate interests to keep a trace of who already applied for the Companies. This limited data set will however only be stored for archiving and legal defence purposes but will not be processed as part of any operational systems or processes.

7. IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

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 may not be able to process your application successfully. For example, if We require reference checks for this role and you fail to provide us with relevant details, We may not be able to take your application further.

8. A REQUEST FROM US

Please could you assist us by notifying us of any relevant change in your details and ensuring your personal data is accurate at all times. Please also inform your dependents whose data you provide to the Us about the content of this notice, and provide them with a copy of this notice and access to a hard copy of our privacy policy.

9. WHY WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

Exceptionally, if We would need to collect particularly sensitive personal information, We would only do so in the following ways and only within the limits of Applicable Laws:

- We will use information about your disability status to consider whether We need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

10. INFORMATION ABOUT CRIMINAL CONVICTIONS

We envisage that We may process information about criminal convictions, but only for specific roles, such as in treasury and legal or other roles which inherently have a higher risk profile (eg senior positions, directors, etc.), and where permissible under local laws.

Where legally permissible, We may collect information about your criminal convictions history if We would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory).

11. AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

12. DO WE SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES?

We will only share your personal information with the following third parties for the purposes of processing your application.

At present, the following categories of third parties are :

- IT providers for the recruitment process
- Aptitude test providers
- Any local recruitment agencies
- Goodman group entities

Parties agree that GMS shall be responsible for the selection of data processors and shall ensure that the selected data processors provide appropriate measures of protection to comply with the Applicable Laws. Parties agree that GMS shall be responsible for the selection of other recipients and/or providers and shall ensure that these provide appropriate measures of protection to comply with the Applicable Laws.

For transfers of Personal Data from Europe to a country outside of the European Economic Area, We ensure that the transfer is covered by an adequacy decision of the European Commission or subject to appropriate additional safeguards under standard contractual clauses. Data may be transferred to Australia and the United States of America. You can obtain a copy of the standard contractual clauses by contacting us at privacy.ukce@goodman.com or hradmin.ce@goodman.com.

13. DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our HR team at hradmin.ce@goodman.com.

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.

14. HOW LONG WILL WE USE YOUR INFORMATION FOR?

In case you are not appointed for a certain role, We may keep personal data about you based on our legitimate interests for a period up to 2 years to contact you for new opportunities. Personal data of applicants for positions based in Germany is kept for up to 6 months.

It also allows us to 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. If a role relates to a position where We recruit subject to a work permit or immigration approval, We may need to keep some of your information for a longer period in line with government guidance.

After these 2 years, if We want to continue to be able to contact you for new opportunities, We will ask for your consent.

After these 2 years, We will retain your first and last names based on our legitimate interests to keep a trace of who already applied for the Companies. This limited data set will however only be stored for archiving and legal defence purposes but will not be processed as part of any operational systems or processes.

After these periods, We will securely delete your personal information in accordance with our HR data retention policy.

15. YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION & CONTACT DETAILS

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information We hold about you and to check that We are lawfully processing it.
- **Request correction** of the personal information that We hold about you. This enables you to have any incomplete or inaccurate information We hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground (e.g. when you don't want to be contacted for future opportunities).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Withdraw a given consent** at any time to stop a data processing that is based on your consent. The withdrawal will not affect the lawfulness of the processing based on the consent before the withdrawal.
- **Lodge a complaint** with a supervisory authority if you consider the data processing to be an infringement of the GDPR.

If you want to invoke one of these rights, please contact the HR team by email at this address hradmin.ce@goodman.com. Your dependants whose details you give us have similar rights.

In case you have any questions, concerns or complaints with respect to the processing of your personal information, you can also contact the responsible for data protection at this address: privacy.ukce@goodman.com.

16. CHANGES TO THIS NOTICE

Any changes We make to this notice in the future will, where appropriate, notified to you by e-mail or be made available on our website.

Schedule 1: Overview of the Companies :

Belgium:

Goodman Belgium NV, Medialaan 50, 1800 Vilvoorde, Belgium

Goodman Management Services (Belgium) NV, Medialaan 50, 1800 Vilvoorde, Belgium

T: +32 2 263 40 00

Luxembourg

Goodman Management Holding (Lux) S.à.r.l., 5 rue de Strasbourg, L-2561 Luxembourg, Grand Duchy Luxembourg

GELF Management (Lux) S.à r.l., 5 rue de Strasbourg, L-2561 Luxembourg, Grand Duchy Luxembourg

GJL Management (Lux) S.à r.l., 5 rue de Strasbourg, L-2561 Luxembourg, Grand Duchy Luxembourg

T: +35 226 363 220

France

Goodman France S.à r.l., 24, rue de Prony, 75017, Paris, France

T: +33 1 55 35 08 50

Germany

Goodman Germany GmbH, Peter-Müller-Straße 10, 40468, Düsseldorf, Germany

T: +49 211 49 980

Italy

Goodman Italy srl, Largo Augusto, 3, 20122 Milan, Italy

T: +39 342 876 86 15

Netherlands

Goodman Netherlands BV, Zuidplein 164, 1077 XV Amsterdam, Netherlands

T: +31 20 709 39 30

Spain

Goodman Real Estate (Spain) S.L., Paseo de la Castellana, 93, 28046, Madrid, Spain,

T: +34 91 414 15 50