



## Global Candidate Privacy Notice

<b>Privacy Notice Contact:</b>	<a href="mailto:corporateprivacy.im@pg.com">corporateprivacy.im@pg.com</a>	<b>Date:</b>	August 22, 2023
<b>Region:</b>	Global	<b>Scope:</b>	All Candidates

### 1.0 Intent

This notice ("Notice") informs you of how The Procter & Gamble Company and its subsidiaries and/or affiliates ("P&G" or the "Company") will collect and manage your personal information ("Candidate Personal Information"). For the purposes of this Notice, the term Candidate includes any individual who has shown interest in applying for employment with P&G and/or provided Personal Information to P&G in order to be considered for employment at P&G, including individuals who were previously employed by P&G and have re-submitted their details for consideration for a new role.

This Notice is in line with [P&G's Purpose, Values, and Principles](#) ("PVPs"). In addition, many countries have specific legal requirements governing the use of Personal Information, including Candidate Personal Information. The Company will comply with all laws and regulations, including local data protection and co-determination laws, and will implement additional procedures, standards, and policies wherever needed to meet these requirements. Accordingly, the actual Candidate Personal Information collected and/or accessed by P&G may differ from jurisdiction to jurisdiction to comply with local laws.

The Company makes reasonable efforts to ensure that Candidate Personal Information is reliable for its intended use. Candidates are equally responsible for updating and checking the accuracy of the information they or others provide to P&G on their behalf.

### 2.0 Notice

P&G respects your privacy. This Notice describes how we process Candidate Personal Information, the types of information we collect; the purposes for which we use it; the relevant legal or business basis; the parties with whom we share it; and the choices you can make about our use of Candidate Personal Information. We also describe the measures we take to protect the security of Candidate Personal Information and how you can contact us about our privacy practices.

#### 2.1 What Types of Candidate Personal Information Do We Collect?

We will always minimize the types and amount of Candidate Personal Information the Company may collect from or about you. However, the collection of information and access to such information will vary depending on country-specific legal and/or business requirements. We will notify you at the point of collection when the Candidate Personal Information that we request of you is voluntary (rather than required) to proceed with your recruitment process.

There are various stages of Candidate Personal Information collection during the recruitment process:

***Stage 1: Personal Information collected from a Candidate who has not yet commenced our recruitment process, but has shown interest in applying for employment at P&G:***

<b>Type of Candidate Personal Information Collected in Stage 1</b>	<b>Why Do We Collect and Process Such Candidate Personal Information?</b>
<u>Contact Information</u> <ul style="list-style-type: none"> <li>• Full name or previous names (such as maiden names)</li> <li>• Honorifics and titles, including preferred name and salutation</li> <li>• Email address</li> <li>• Mobile number</li> </ul>	<p>To provide you with news and updates about P&amp;G careers and roles by email, and/or text message (including text messaging applications such as WhatsApp).</p> <p>To allow P&amp;G and its advertising partners to show news and updates about P&amp;G careers and roles through online channels (such as social media).</p>
<u>Professional Data</u> <ul style="list-style-type: none"> <li>• Resume or CV</li> </ul>	To assess your skills, qualifications, and interests against our career opportunities.
<u>Digital Identification Data</u> <ul style="list-style-type: none"> <li>• IP address</li> <li>• Cookie, tag and/or pixel identifier</li> </ul>	To deliver digital services through our recruiting website(s) and applications, including: to provide you with relevant updates about P&G careers and roles you may be interested in, to learn more about the way you interact with P&G content, to help P&G improve your experience when visiting our websites, to remember your preferences (such as a language or a region), to identify and resolve errors, and to analyze how well our websites are performing.

***Stage 2: Personal Information collected from active participants in our recruitment process:***

<b>Type of Candidate Personal Information Collected in Stage 2</b>	<b>Why Do We Collect and Process Such Candidate Personal Information?</b>
<u>Contact Information</u> <ul style="list-style-type: none"> <li>• Full name or previous names (such as maiden names)</li> <li>• Honorifics and titles, including preferred name and salutation</li> <li>• Mailing address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Mobile number</li> </ul>	<p>To initiate your employment application and contact you with necessary actions and updates. Such data is used throughout the remainder of the recruitment process to communicate with you.</p> <p>If you consent, P&amp;G may also send you automated updates via text or text messaging applications (e.g. a reminder to complete necessary documentation).</p>
<u>Professional Data</u> <ul style="list-style-type: none"> <li>• Resume or CV</li> </ul>	To assess your skills, qualifications, and interests against our career opportunities.

<p><i>Additional Professional Data</i></p> <ul style="list-style-type: none"> <li>• Prior work history including references</li> <li>• Data from LinkedIn profiles and similar platforms</li> <li>• Academic data such as education and degree information</li> <li>• Professional licenses, certifications and memberships and affiliations</li> <li>• Personal and professional skills (e.g., languages spoken), interests and hobbies</li> <li>• Professional goals and interests</li> </ul>	<p>To help us evaluate you against the specific requirements of the role(s) you are applying for.</p>
<p><i>Additional Digital Identification</i></p> <ul style="list-style-type: none"> <li>• Digital signature</li> </ul>	<p>To allow you to verifiably authorize and submit employment application forms in a digital format.</p>
<p><i>Audio-Visual Information</i></p> <ul style="list-style-type: none"> <li>• Image</li> <li>• Voice</li> </ul>	<p>To allow us to conduct phone/video interviews.</p>
<p><i>Financial information</i></p> <ul style="list-style-type: none"> <li>• Bank account information</li> </ul>	<p>To facilitate authorized expense reimbursement during the interview process.</p>
<p><i>Government ID/Work Eligibility Information</i></p> <ul style="list-style-type: none"> <li>• National ID</li> <li>• Citizenship</li> <li>• Residency</li> <li>• Nationality</li> <li>• Country of birth</li> <li>• Military and/or veteran status</li> </ul>	<p>To determine your work eligibility for specific role(s) you are applying for and to ensure there are no duplicate applications.</p>
<p><i>Test Results</i></p> <ul style="list-style-type: none"> <li>• The scores from any aptitude, reasoning, or personality tests that you complete as part of the recruitment process.</li> </ul>	<p>To determine your qualification and suitability for the relevant role prior to entering into an employment contract with you.</p>

<p><i>Personal Characteristics*</i></p> <ul style="list-style-type: none"> <li>• Gender</li> <li>• Disability</li> <li>• Military and/or veteran status</li> <li>• Ethnicity and/or race</li> </ul> <p>*Note that the collection of these types of Personal Information may vary depending on geographic location and subject to applicable law. Such data may not be requested in all locations and may instead be collected in Stage 3 below.</p>	<p>To assess and support our diversity recruitment and staffing efforts and for legal reporting purposes, subject to applicable law. Disability data is also collected to ensure that we provide (at your request) any reasonable accommodation during your recruitment process.</p> <p>At your choosing, we may also use this information to facilitate your participation with P&amp;G affinity groups.</p>
<p><i>Relationship(s) to any individual(s) who work for P&amp;G or a company that makes products similar to P&amp;G, including, details of such relationship if applicable.</i></p>	<p>To screen your application against potential conflicts of interest.</p>
<p><i>Additional information collected during the interview process</i></p>	<p>To help us evaluate you against the specific requirements of the role(s) you are applying for.</p>
<p><i>Any other information required by law for employment compliance or voluntarily provided to us by Candidates</i></p>	

***Stage 3: Personal Information collected after a Candidate accepts an employment offer, but before commencing employment:***

<b>Type of Candidate Personal Information Collected in Stage 3</b>	<b>Why Do We Collect and Process Such Candidate Personal Information?</b>
<p><i>Medical or Health information</i></p>	<p>To determine if you can safely perform the duties of your role and to determine if you need any reasonable accommodation to do so, subject to applicable law and only if required for your role.</p>
<p><i>Any other information required by law for employment compliance or voluntarily provided to us by Candidates</i></p>	

## 2.2 Legal Bases for Processing

Applicable laws in some locations may require P&G to establish a legal basis for processing Candidate Personal Information. Such legal bases are set forth in Attachment 1 to this Notice.

## 2.3 Candidate Assessments

As part of our recruitment process, we may require candidates to complete assessments. These assessments measure skills and abilities that generally do not emerge from interviews, and help us to

determine whether Candidates are suitably qualified for the roles for which they have applied and whether they exhibit characteristics that would make them successful at P&G. These assessments are required to help us identify a shortlist of suitable Candidates prior to entering into an employment contract.

For example, one of our tests requires Candidates to respond to hypothetical work situations, and is designed to assess their experiences, interests, and work-related attitudes. This allows P&G to measure how you score with respect to personality traits that will lead to successful job performance and team integration at P&G. Another assessment measures your reasoning skills, which helps us evaluate whether your abilities meet the specific criteria required to successfully perform the job for which you applied. Another type of assessment (specific to plant technician or experienced sales roles) helps us assess your likelihood of successful job performance based on your response to simulated scenarios. These assessments are critical as they help determine if you possess baseline competencies and characteristics needed to be successful at P&G.

For most roles, assessment results automatically determine whether a Candidate's application may move forward, without consideration of other parts of your application.

To the extent these assessments may be considered automated decision-making under applicable laws, P&G complies with applicable laws in conducting such assessments, including offering Candidates rejected on the basis of automated assessment results the opportunity to request a human review. To the extent this option is available to you, you will be notified via email with further instructions on how to request such a review. For more information on how these tests work, or to learn how to request a disability accommodation, please visit <https://www.pgcareers.com/hiring-process>.

## **2.4 How We Process Your Personal Data to Provide News and Updates Through Email, Text Message, and/or Online Channels**

If you submit your email address or phone number on our candidate website(s) or at a recruiting event and consent to receive marketing communications, P&G may send you news and updates about P&G careers and roles by email or text message.

If you visit or share your Personal Information on P&G's candidate website(s) or at recruiting events, sign up for job alerts (e.g. via our candidate website(s), and/or apply for employment with P&G, P&G may also share your Candidate Personal Information, including Digital Identification Data, email address (in hashed form), and/or phone number (in hashed form) with its advertising partners. P&G's advertising partners may then show you news and updates about P&G careers and job roles that may be relevant to you, and others like you, through online channels (including, but not limited to, channels such as LinkedIn, Instagram, Meta, Facebook, Google, TikTok, and YouTube). Where legally required, P&G will obtain your consent and/or allow you to opt-out of your data being use for these purposes.

In tailoring the above activities and where legally permitted, P&G may use additional characteristics such as your general location (e.g. zip code), nationality, citizenship status, gender, professional data (e.g. school attended), and data related to your interaction with our recruiting processes and systems (e.g. assessment results and interview impressions and/or your stage of completion in P&G's application process).

Where we rely on your consent for the above activities and you wish to withdraw that consent, you may contact us by visiting this [site](#) and selecting “I need more help.” You can also tell us to stop sending you email and/or text messages by following the opt-out instructions sent with these communications. Your withdrawal of consent for these specific activities will not affect the lawfulness of our processing prior to such withdrawal and will not disqualify you from participating in P&G’s recruitment process.

If you have seen an advertisement on any online channels relating to P&G careers or roles without having interacted with P&G or our candidate website(s) in the past, this may be because we have asked our advertising partners to identify individuals potentially suitable for roles with P&G (e.g. based on location and interests) on our behalf and present them with news and updates relating to P&G careers and roles. P&G relies on its legitimate interests in identifying and attracting qualified Candidates as its legal basis for these activities.

## **2.5 How Do We Use Cookies?**

Cookies are small files sent to your computer as you surf the web. They store useful information about how you interact with the websites you visit. P&G uses cookies on our career-related websites. You can set your browser to refuse all cookies or to indicate when a cookie is being sent to your computer. However, this may prevent our sites or services from working properly. You can also set your browser to delete cookies every time you finish browsing.

P&G complies with applicable laws related to cookies. In some locations, we offer a cookie consent management platform which allows you to exercise choice with respect to certain categories of cookies. If this is available, this may appear as a cookie banner and/or as an icon that is visible on the applicable websites.

## **2.6 How Do We Share Candidate Personal Information?**

P&G may share your Candidate Personal Information with external parties who support our recruitment process and communications with you. The Company requires that external parties provide equivalent levels of protection as applied by the Company when handling Candidate Personal Information.

There are certain situations where you will be asked to share personal information directly with third-parties connected to P&G’s recruiting or onboarding efforts, and in these cases, P&G does not control how your data is processed. In these cases, you should ensure you read and understand the third-parties privacy notices and practices before sharing your Personal Information.

Candidate Personal Information may be shared with our P&G headquarters and affiliates globally as necessary to facilitate your potential and/or actual employment with P&G. You can find information on how we protect Candidate Personal Information in such a situation in section 2.8 of this Notice. We may also disclose Candidate Personal Information if we are required to do so by law or legal process; to enforce or protect the rights and policies of P&G; to assist in the investigation of suspected or actual misconduct or illegal activity; and/or as part of a sale of a P&G business to another company.

## **2.7 What Are Your Privacy Rights?**

Subject to applicable law, you may have the right to:

- Request access to the Candidate Personal Information we process about you,
- Request that inaccurate Personal Information be corrected,
- Request that your Personal Information be erased,
- Request that P&G restricts its processing of your Personal Information or to object to P&G's processing on grounds relating to your particular situation, and/or
- Request P&G to provide your data in a format that allows its transfer to another party.

Depending on your geographic location, you may have other or additional privacy rights. Please consult the country/state specific addendums [here](#).

Where applicable, you may exercise these rights by deleting/correcting your Candidate Personal Information in Workday (guide [here](#)) or by visiting this [site](#). If you have a complaint regarding P&G's processing of your Personal Information, you may also lodge such complaints with the data protection authority in your country.

Where P&G relies on your consent for processing of Candidate Personal Information, you may withdraw your consent at any time during the recruitment process by visiting this site and selecting "I need more help." This will not affect the lawfulness of P&G's processing prior to such withdrawal. The Candidate Personal Information we collected during your recruitment process will be retained and deleted as per Section 2.10 below.

## **2.8 Do We Transfer Candidate Personal Information?**

If legally permitted, Candidate Personal Information may be transferred to countries outside of the jurisdiction where you provided it. For example, Candidate Personal Information may be stored in systems in the United States or accessed from other global P&G affiliates. Those countries may not have the same data protection laws as your country of residence. When your information is transferred to or accessed from countries outside your home country, we implement appropriate safeguards as well as any legally required administrative, technical, and/or contractual requirements to protect your Candidate Personal Information. We perform transfers outside of the European Union and United Kingdom using contractual protections (such as Standard Contractual Clauses). If you would like a copy of the relevant transfer mechanism, contact [corporateprivacy.im@pg.com](mailto:corporateprivacy.im@pg.com). P&G will also comply with specific country requirements that restrict data transfers outside of the country of collection and/or that require data localization.

If you are located in the European Economic Area (EEA), United Kingdom (and Gibraltar) or Switzerland, please note that P&G is certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) [collectively, the "Data Privacy Framework"] developed by the U.S. Department of Commerce and the European Commission and Information Commissioner and Swiss Federal Data Protection, respectively regarding the transfer of personal information from the EEA, United Kingdom (and Gibraltar) or Switzerland to the U.S., [Click here](#) to view our *Data Privacy Framework: Worker Privacy Policy*.

## **2.9 How Do We Secure Candidate Personal Information?**

We implement appropriate physical, administrative, contractual, and technical measures, such as encryption and access controls, designed to protect Candidate Personal Information against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access or use, and all other unlawful forms of processing.

## **2.10 How Long Do You Keep my Personal Information?**

We keep Candidate Personal Information for a period of three (3) years. P&G has adopted this three (3) year global standard to facilitate a Candidate's ability to apply to different roles in multiple countries without having to create a new profile. Candidates can request that their Candidate Personal Information be deleted at any time within the three year period (note that if this action is performed, this may disrupt or end any ongoing recruiting process). The request for deletion before the conclusion of the three year period will generally be accepted, unless the longer, three-year data retention period is required by applicable law; and/or to fulfill P&G's legitimate business interests, including, but not limited to our right to exercise or defend legal claims

## **3.0 Future Modifications**

P&G may modify this Notice, for example, to comply with changes in laws, regulations, Company practices and procedures, or to respond to new threats or new requirements imposed by data protection authorities. Where such changes materially affect our processing of your Candidate Personal Information, we will notify you accordingly.

## **4.0 Contact Information**

The controller of your Candidate Personal Information is The Procter & Gamble Company, including relevant subsidiaries and affiliates. If you have questions about your Candidate Personal Information or specific subsidiaries and affiliates that may have access to your Personal Information, please email us at [corporateprivacy.im@pg.com](mailto:corporateprivacy.im@pg.com). If you have these or any other questions or concerns with respect to our processing of your personal data/Candidate Personal Information, you may also contact our Global Data Protection Officer at – Email: [pgprivacyofficer.im@pg.com](mailto:pgprivacyofficer.im@pg.com), Phone: +1 (513) 622-0103, Mailing Address: 1 Procter & Gamble Plaza, Cincinnati, OH 45202, U.S.A.



## Attachment 1: Legal Bases for Processing

There are various stages of Candidate Personal Information collection during the recruitment process:

***Stage 1: Personal Information collected from a Candidate who has not yet commenced our recruitment process, but has shown interest in applying for employment at P&G:***

Type of Candidate Personal Information Collected During Stage 1	Legal Basis Relied on for Processing (European Economic Area/UK/Switzerland)	Legal Basis Relied on for Processing (Greater China; Asia, Middle East, and Africa)
<u>Contact Information</u> <ul style="list-style-type: none"><li>• Full name or previous names (such as maiden names)</li><li>• Honorifics and titles, including preferred name and salutation</li><li>• Email address</li><li>• Telephone number</li><li>• Mobile number</li></ul>	Consent	Consent
<u>Professional Data</u> <ul style="list-style-type: none"><li>• Resume or CV</li></ul>	Consent	Consent
<u>Digital Identification Data</u> <ul style="list-style-type: none"><li>• IP address</li><li>• Cookie, tag and/or pixel identifier</li></ul>	Consent. You will notice a cookie banner on the relevant P&G website which allow you to manage your cookie preferences.	Consent, if legally required

***Stage 2: Personal Information collected from active participants in our recruitment process:***

Type of Candidate Personal Information Collected During Stage 2	Legal Basis Relied on for Processing (European Union/UK)	Legal Basis Relied on for Processing (Greater China; Asia, Middle East, and Africa)
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<u>Contact Information</u> <ul style="list-style-type: none"> <li>• Full name or previous names (such as maiden names)</li> <li>• Honorifics and titles, including preferred name and salutation</li> <li>• Mailing address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Mobile number</li> </ul>	<p>Legitimate interests in communicating with candidates.</p> <p>Consent for automated text reminders.</p>	Consent
<u>Professional Data</u> <p>Resume or CV</p>	<p>Legitimate interests in assessing Candidates suitability for a role at P&amp;G.</p>	Consent
<u>Additional Professional Data</u> <ul style="list-style-type: none"> <li>• Prior work history including references</li> <li>• Data from LinkedIn profiles and similar platforms</li> <li>• Academic data such as education and degree information</li> <li>• Professional licenses, certifications and memberships and affiliations</li> <li>• Personal and professional skills (e.g., languages spoken), interests and hobbies</li> <li>• Professional goals and interests</li> </ul>	<p>Legitimate interests in assessing Candidates suitability for a role at P&amp;G.</p>	Consent
<u>Additional Digital Identification</u> <ul style="list-style-type: none"> <li>• Digital signature</li> </ul>	<p>Legal obligation to comply with applicable digital signature requirements.</p>	Consent
<u>Audio-Visual Information</u> <ul style="list-style-type: none"> <li>• Image</li> <li>• Voice</li> </ul>	<p>Legitimate interests in conducting interviews as part of our recruitment process.</p>	<p>Consent</p> <p>(A separate consent is required in Mainland – Greater China when processing sensitive personal information)</p>

<i>Financial information</i> <ul style="list-style-type: none"> <li>Bank account information</li> </ul>	<p>Legitimate interests in ensuring that expenses incurred during the interview process are reimbursed.</p>	<p>Consent</p> <p>(A separate consent is required in Mainland – Greater China when processing sensitive personal information)</p>
<i>Government ID/Work Eligibility Information</i> <ul style="list-style-type: none"> <li>National ID</li> <li>Citizenship</li> <li>Residency</li> <li>Nationality</li> <li>Country of birth</li> <li>Military and/or veteran status</li> </ul>	<p>Legitimate interests in ensuring the smooth running of our recruitment process.</p> <p>Legal obligation to ensure that Candidates are eligible to work.</p>	<p>Consent</p> <p>(A separate consent is required in Mainland – Greater China when processing sensitive personal information)</p>
<i>Test Results</i> <ul style="list-style-type: none"> <li>The scores from any aptitude, reasoning, or personality tests that you complete as part of the recruitment process.</li> </ul>	<p>Contractual necessity</p>	<p>Consent</p>
<p><i>Personal Characteristics</i> (note that the collection of the following types of Personal Information may vary depending on geographic location, subject to applicable law, and may not be requested in all locations, or may instead be collected in Stage 3 below)</p> <ul style="list-style-type: none"> <li>Gender</li> <li>Disability</li> <li>Military and/or veteran status</li> <li>Ethnicity and/or race</li> </ul>	<p>Where information is required to be shared by the Candidate, and except as noted below, the legal basis is P&amp;G's legitimate interests in ensuring that P&amp;G recruits a diverse workforce.</p> <p>Where information is provided voluntarily and not required to be shared by the Candidate, the legal basis is Consent.</p> <p>For Medical/Health data shared in connection with a candidate's Disability, the legal basis is our legitimate interests in ensuring that appropriate accommodations are made for Candidates.</p>	<p>Consent</p>

	<p>P&amp;G may also rely on legal obligation under applicable employment laws.</p> <p>For ethnicity and/or race data collected in the UK, P&amp;G relies on the substantial public interest in recruiting a diverse workforce.</p>	
<i>Additional information collected during the interview process</i>	Legitimate interests in assessing Candidates suitability for a role at P&G.	Consent
<i>Any other information required by law for employment compliance or voluntarily provided to us by Candidates</i>		

**Stage 3: Personal Information collected after a Candidate accepts an employment offer, but before commencing employment:**

<b>Type of Candidate Personal Information Collected During Stage 3</b>	<b>Legal Basis Relied on for Processing (European Union/UK)</b>	<b>Legal Basis Relied on for Processing (Greater China; Asia, Middle East, and Africa)</b>
<p><i>Additional Government ID/Work Eligibility Information</i></p> <ul style="list-style-type: none"> <li>• Date of birth</li> <li>• Social security number</li> <li>• Driver's license number</li> <li>• Passport number</li> <li>• Other government-issued identifiers as may be needed for compliance (e.g., work or immigration visas, or license numbers if you are a licensed professional)</li> </ul>	<p>Legal obligation to ensure individuals are qualified for employment.</p> <p>Legitimate interests in ensuring the safety of our workforce, and that individuals are appropriate qualified to perform their roles.</p>	Consent

<i>Medical or Health information</i>	<p>Legitimate interests in ensuring that appropriate accommodations are made for Candidates, and in assessing suitability for a role.</p> <p>Legal obligation under applicable employment laws.</p>	Consent
<i>Any other information required by law for employment compliance or voluntarily provided to us by Candidates</i>		