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| **Privacy Notice Contact:**  Global Data Protection Officer | **Date:** August 18, 2021 |
| (compliance.im@pg.com)  **Region:** Global | **Scope:**  All Candidates |

**Global Candidate Privacy Notice**

# **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 Candidate Personal Information. It also describes the Company’s expectations for those who collect and manage Candidates’ Personal Information.

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 expects its employees and any P&G contractors, suppliers, agencies, temporary workers, or any other parties acting on P&G’s behalf (collectively, “External Parties”) who collect or manage Candidate Personal Information to abide by the principles described in this Notice, whether they are utilizing P&G’s and/or their own electronic systems and data management tools. P&G employees are responsible for ensuring that any External Parties they work with in support of P&G operations comply with this Notice and with any additional specific standards and procedures that are applicable.

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.

1. **Definitions**

**Candidate:** For the purposes of this Notice, the term Candidate includes any individual who has 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.

**Personal Information:** Any information relating to an identified or identifiable individual.

**Sensitive Personal Information:** Personal Information revealing race, ethnicity, political views, religion, health, sexual orientation, trade union membership, genetic or biometric data, information about criminal convictions and offenses, and as otherwise defined by relevant law.

**The Company or P&G:** For purposes of this Notice, the Company or P&G refers to The Procter & Gamble Company, its subsidiaries and/or affiliates.

1. **Principles**

P&G’s fundamental data processing principles are:

* Collect and manage the minimum amount of Candidate Personal Information necessary in order to: promote P&G as a potential employer and increase the number of Candidates; assess the Candidate’s employment application; facilitate the Candidate’s onboarding as an employeeif an employment offer is extended and/or accepted; and keep the Candidate informed of additional roles of relevance to their employment interests and goals.
* Respect individual privacy.
* Comply with our PVPs and relevant laws.
* Follow appropriate standards and procedures when collecting and/or managing Candidate Personal Information.

1. **Notice**

P&G respects your privacy. This Notice describes how we process Candidate Personal Information, the types of information we collect; for what purposes we use it and on what legal or business basis; 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.

* 1. **What Types of Candidate Personal Information Do We Collect?**

We collect and manage the minimum amount of Candidate Personal Information in compliance with applicable legal requirements to promote P&G as a potential employer and increase the number of Candidates; to assess the Candidate’s employment application; to facilitate the Candidate’s onboarding as an employee if an employment offer is extended and/or accepted; and to keep the Candidate informed of additional roles of relevance to their employment interests and goals.

**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 whether the Candidate Personal Information that we request of you is required or is voluntary to proceed with your recruitment process.**

There are various stages in the collection of data during the recruitment process:

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

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| **Type of Data Collected During Stage 1** | **Why Do We Collect and Process Such Data?** |
| **We will always minimize the types of Candidate Personal Information the Company may collect from or about you. However, the collection of information and access to information will vary depending on country-specific legal and/or business requirements. We will notify you at the point of collection whether the Candidate Personal Information requested is required or is voluntary to proceed with your recruitment process.** | |
| *Contact Information*  • Full name or previous names (such as maiden names)  • Honorifics and titles, including preferred name and salutation  • Mailing address  • Email address  • Telephone number  • Mobile number | Communicating with you about current and/or future career opportunities at P&G. |
| *Professional Data*  • Resume or CV | Assessing your skills, qualifications and interests against our career opportunities. |
| Digital Identification  • IP address  • Cookies, tags and/or pixels | Efficiently delivering digital services through our recruiting and other corporate website(s). |
| *Any other information required by law for employment compliance* |  |

***Stage 2****:* ***Data collected from a Candidate who has commenced our recruitment process, before a decision is made on an application:***

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| **Type of Data Collected During Stage 2** | **Why Do We Collect and Process Such Data?** |
| **We will always minimize the types of Candidate Personal Information the Company may collect from or about you. However, the collection of information and access to information will vary depending on country-specific legal and/or business requirements. We will notify you at the point of collection whether the Candidate Personal Information requested is required or is voluntary** **to proceed with your recruitment process.** | |
| *Additional Professional Data*  • Prior work history including references  • Data from LinkedIn profiles and similar platforms  • Academic data such as education and degree information  • Professional licenses, certifications and memberships and affiliations  • Personal and professional skills (e.g., languages spoken), interests and hobbies  • Professional goals and interests | To help us evaluate you against the specific requirements of the role(s) you are applying for. |
| *Additional Digital Identification*   * Digital signature | To allow you to verifiably authorize and submit employment application forms in a digital format. |
| *Audio-Visual Information*  • Image  • Voice | To allow us to conduct phone/video interviews. |
| *Financial information*  • Bank account information | To facilitate authorized expense reimbursement during the interview process. |
| *Government ID/Work Eligibility Information*   * National ID * Citizenship * Residency * Nationality * Country of birth * Military and/or veteran status | To determine your work eligibility for specific role(s) you are applying for and to ensure there are no duplicate applications. |
| *Personal Characteristics*   * Gender * Disability * Military and/or veteran status * Ethnicity and/or race | To assess and support our diversity recruitment and staffing efforts, and for legal reporting purposes. Disability data is also collected to ensure that we provide (at your request) any reasonable accommodation during your recruitment process. |
| *Any other information required by law for employment compliance* |  |

***Stage 3****:* ***Data collected after a Candidate accepts an employment offer, but before the first day of employment, while work contingencies are confirmed:***

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| **Type of Data Collected During Stage 3** | **Why Do We Collect and Process Such Data?** |
| **We will always minimize the types of Candidate Personal Information the Company may collect from or about you. However, the collection of information and access to information will vary depending on country-specific legal and/or business requirements. We will notify you at the point of collection whether the Candidate Personal Information requested is required or is voluntary to proceed with your recruitment process.** | |
| *Additional Government ID/Work Eligibility Information*  • Social security number  • Driver’s license number  • Passport number  • 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) | To enable employment verification and background screening, such as reference checks, license verifications, and criminal records checks, subject to applicable law  For security and risk management, such as collecting driver’s license data for employees who operate Company automobiles, professional license verification, fraud prevention and similar purposes |
| *Medical or Health information* | To determine if you can safely perform the duties of your role, and to determine if you need any reasonable accommodation to do so. |
| *Any other information required by law for employment compliance* |  |

***Stage 4****:* ***Data collected after Candidate successfully completes work contingencies to facilitate onboarding as an employee:***

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| **Type of Data Collected During Stage 4** | **Why Do We Collect and Process Such Data?** |
| **We will always minimize the types of Candidate Personal Information the Company may collect from or about you. However, the collection of information and access to information will vary depending on country-specific legal and/or business requirements. We will notify you at the point of collection whether the Candidate Personal Information requested is required or is voluntary to proceed with your recruitment process.** | |
| *Additional Government ID/Work Eligibility Information*  • Work visa | To enable us to administer payroll and benefits programs and comply with applicable laws. |
| *Personal Characteristics*   * Marital status * Date of birth * Place of birth * Preferred name and salutation | To enable multiple HR and employment purposes and activities of importance to you, your family, and/or your productivity at work, including setting up compensation and benefits and providing site/systems access. |
| *Additional Financial Information*   * Bank Account Number | To confirm the information provided in Stage 1 to set up payroll and reimbursement deposits. |
| *Family/Dependents’ Information*   * Name * Date of birth * Gender * Place of birth * Citizenship/nationality * Government ID * Contact information | To enable us to administer payroll and benefits programs and comply with applicable laws, such as reporting compensation to government agencies. |
| *Trade Union Membership Information* | To ensure accurate payroll and benefits. |
| *Any other information required by law for employment compliance* |  |

* 1. **Under What Legal and/or Business Basis Do We Process Candidate Personal Information?**

In most countries, the primary legal and/or business basis for collecting and using Candidate Personal Information is your consent. In certain countries, the legal and/or business basis may also be pre-employment contract data processing requirements, our legitimate business interests, and/or to comply with legal obligations. For further information on your right to withdraw consent, and the consequences thereof, see section 4.4 of this Notice.

* 1. **How Do We Share Candidate Personal Information?**

P&G will only share Candidate Personal Information with those who have a legitimate business interest to know.

P&G may share your information with External Parties who perform P&G business operations on our behalf. The Company requires that External Parties provide equivalent levels of protection as applied by the Company when handling Candidate Personal Information. We contractually require External Parties acting as our data processors to only process the data in accordance with our instructions and to secure the data. These data processors may not otherwise use or disclose the information, except as authorized by P&G, and/or to comply with legal requirements.

There are certain situations where you will be asked to share personal information directly with service providers connected to P&G’s recruiting or onboarding efforts, where P&G does not control how your data is processed. In those situations, please ensure you read and understand the privacy policies and practices of such providers.

Candidate Personal Information may be shared with our P&G headquarters and affiliates globally as necessary to fulfill business-related purposes. You can find information on how we protect Candidate Personal Information in such a situation in section 4.5 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.

* 1. **What Are Your Privacy Rights?**

P&G processes your Candidate Personal Information primarily based on your consent. You may withdraw your consent to the processing of your Candidate Personal Information at any time during the recruitment process by emailing us at [candidatedata.im@pg.com](mailto:candidatedata.im@pg.com). Note that once consent is withdrawn, P&G may no longer consider you for employment. The Candidate Personal Information we collected during your recruitment process will be retained and deleted as per Section 4.8 below.

You have the right to contact us and request access to the Candidate Personal Information we may process and use about you. You may request that inaccurate, outdated or no longer necessary information be corrected, erased and/or restricted by contacting us at [candidatedata.im@pg.com](mailto:candidatedata.im@pg.com). Where permitted by applicable law, you may ask P&G to provide your data in a format that allows you to transfer your data to a designated service provider, as appropriate in the circumstances. If you are not happy with our response to your requests, you may lodge a complaint with the data protection authority in your country.

* 1. **Do We Transfer Candidate Personal Information?**

If legally allowed, Candidate Personal Information may be transferred to other countries. P&G is a global business and has Candidates in many countries. Candidate Personal Information may be stored in systems in the United States, accessed from other P&G affiliates worldwide, including their service providers, or transferred to other countries of the world as necessary to conduct the relevant operations, in compliance with applicable law. This means that your Candidate Personal Information may be transferred to countries outside the region in which you desire to seek P&G employment or have accepted an employment offer. 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, both among P&G entities and among P&G and our service providers, using contractual protections, and the associated due diligence and technical requirements, that EU regulators have pre-approved to ensure your data is protected (known as Standard Contractual Clauses). If you would like a copy of a transfer agreement, 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.

* 1. **How Do We Secure Candidate Personal Information?**

We implement appropriate physical, administrative, contractual, and technical measures, such as pseudonymization, 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.

**4.7 Does P&G Engage in Automated Decision Making in its Recruiting Processes?**

P&G uses automated assessments as one tool in the recruiting process for most roles. These assessments measure skills and abilities that generally do not emerge from interviews; have standardized scores (pass/fail); do not otherwise consider any of your Candidate Personal Information; are entirely automated; and in some cases are not reviewed by any individuals as part of your employment application process.  For example, one of our tests requires you to respond to hypothetical work situations, and is designed to assess your experiences, interests and work-related attitudes; this allows P&G to measure your compatibility against P&G competencies for defining successful job performance.  Another test measures your cognitive ability, which is important because the nature of our work is complex and continually changing, and our environment requires you to continuously learn and grow over time. These assessments are critical as they help determine if you possess baseline competencies and characteristics needed to be successful at P&G.

**4.8 How Long Do You Keep my Personal Information?**

We keep Candidate Personal Information for a period of three (3) years, except for the information collected during Stage 4 (see Section 4.1), which we immediately delete if you do not become employed by P&G. 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 (3) year period. The request for deletion before the conclusion of the three (3) 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.

1. **Future Modifications**

P&G reserves the right to modify this Notice as needed, 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 accordingly notify you.

1. **Contact Information**

The controller of your Candidate Personal Information is The Procter & Gamble Company, including its subsidiaries and affiliates. If you have questions about your Candidate Personal Information, want to exercise any of your rights under applicable data protection laws or have concerns about a potential data breach, please email us at [candidatedata.im@pg.com](mailto:candidatedata.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. For contact information specific to certain countries, see Addendum A to this Notice.

**ADDENDUM A**

**Asia:**

Procter & Gamble Philippines, Inc.

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