

Fitch Group Candidate Privacy Notice

Last updated September, 2023

Introduction

Fitch Group and its Fitch Group [subsidiaries and affiliates](#) (“Fitch”, “us”, or “we”) are committed to respecting your privacy and protecting your personal data. The company of Fitch Group who process the personal data in relation to your recruiting activity is the controller of your personal data.

Fitch group Candidate Privacy Notice (“Privacy Notice”) describes how we handle and process your personal data in connection with Fitch Group’s recruiting process, programs and talent community, including but not limited to creation and maintaining your profile and any applications on our recruitment portal. We will process your personal data in accordance with this policy unless applicable local law is different. In case of a conflict between this Privacy Notice and applicable law, applicable law will govern.

This privacy policy is only applicable to the personal data processing that relates to the candidate profile, job applications, potential candidates for employment, setting up and maintaining Fitch Career accounts, recruiting process via professional recruiting firms, recruitment marketing activity and participating in our other recruiting programs and events.

Fitch Group may update this Policy from time to time and will post the most recent version online. We recommend you review this policy regularly to keep up to date with any such changes. Information for California residents is presented at the end of this policy.

What type of personal data do we collect and how do we collect it?

Information that you provide to us

You provide certain personal information about yourself when you use the [Fitch careers](#) website, setting up a profile on our recruitment portal. The personal information may include your name, age, gender, address, country, contact details, sponsorship details, visa status, qualifications, employment and education history other application details and your resume/CV, or supporting documents such as a cover letter. In some jurisdictions, if permitted by law, we will also ask you demographic information related questions during your application. This may include your gender, disability information, ethnic origin and reasonable adjustment information. When this is applicable to you, you will see the relevant questions in application form. It is voluntary for you to submit this data. You can always choose “prefer not to disclose option”. To withdraw your consent please send an email to hr@thefitchgroup.com.

You might also choose to join our talent community without immediately applying for a specific position (by signing up to stay connected with Fitch on the career website). In this case we will collect your email address to keep you up-to-date for future job opportunities.

Information we obtain from other sources

We may obtain information about you through a recruitment agency, or through someone who referred you for potential employment including Partner organisations. Your data can be obtained from publicly available sources (for example career network websites such as LinkedIn). If your application is successful and you receive an offer, we may conduct background checks via third party

background screening provider. If permitted by applicable laws, background check provider will ask you to provide information to enable it to complete a series of pre-employment background checks including, (where local jurisdictions allow), identity check, right to work verification, reference check, credit check, financial sanction check, criminal record checks. You will provide this information directly to background check provider through its online platform and the provider will share the information with us including the results of checks.

If we obtain personal information from third parties, we will take reasonable steps to confirm that such personal information was collected lawfully where required to do so by applicable law.

Purposes of personal data collection

Your Personal Data will be processed solely for the purpose of managing our recruitment related activities, which include setting up your profile on our recruitment portal, setting up and conducting interviews, evaluating and assessing your suitability for the position you applied for, to assess your suitability for other open positions, to make hiring decisions, verify your right to work in the jurisdiction of the position for which you have applied, and as is otherwise needed in the recruitment and hiring processes.

If you chose to provide information in the demographic information section, this data will be used in line with our reporting requirements when required by law, to aggregate the data for internal reporting and to provide equal opportunities. Disclosing your information helps us better understand the demographic make-up of our applicant pool and monitor progress against our diversity objectives.

Your personal data may be processed to enter into an employment arrangement with you, such as communicating offers where you have been successful in a recruitment process.

We might also process your personal data to notify you about future open roles or suitable positions when you sign up to receive job alerts on our career page.

In case you are successful, your data might be used for conducting or obtaining reference and background checks or criminal record checks to the extent required or permitted by applicable laws.

Your application will not be subject to automated decision making.

Legal Basis for Fitch to process your data

Depending on the law applicable to your personal data, we might process this personal data on the basis of one or more of the following legal grounds:

- When we obtained your consent for specific processing such as being part of our Talent Community or collecting demographic information (your consent can be withdrawn at any time by contacting us using the details below, contacting our HR employees or deleting your Fitch Career profile/account)
- When processing your personal information is necessary for our (or third-party recipients') legitimate interest in facilitating recruitment, evaluation, and hiring process, in particular interviewing and communicating with you, making decisions about your suitability for the position, performing back-ground checks through service providers (such as education and criminal history, to the extent relevant and permitted and where necessary, also with your consent)
- When applicable to take steps at your request prior to entering into a contract with you

- Where applicable to comply with our legal or regulatory requirements (for example, maintaining records, applicable equal opportunities monitoring and reporting obligations, verifying your right to work in the relevant jurisdiction).
- As required or permitted by law.

How is your personal data shared?

Within group:

Your personal data might be disclosed to different teams and departments at Fitch such as human resources, finance administration functions, hiring manager and the hiring team members, interviewers, IT and compliance/legal department or other individuals who involved in the recruitment process. The purpose for the data sharing is to ensure the recruitment process continuity with all relevant department personnel. To ensure the international transfer of your data, relevant Fitch Group entities have executed data processing agreements, data transfer agreements or other types of data agreements pursuant to the applicable privacy laws in order to implement appropriate safeguards.

Service Providers:

We might share your personal data with various service providers such as recruitment, assessment, background check providers, human resources management technology providers when it is necessary to process your data.

Third Parties:

If it is required or permitted by law, we may disclose your personal data to meet with requirements of law and regulation, or in response to request from regulators, courts or government agencies, or to establish or defend our legal rights.

Some of the data importers may be established in a country other than the respective exporting Fitch entity, with a different level of data protection applicable. If the applicable data protection law contains specific requirements for the transfer, we will transfer your personal data in compliance with these requirements.

For example, when transferring personal data from the EU to a data importer outside the EU for which the EU Commission has not issued an adequacy decision Fitch and the respective local company will conclude the EU Standard Contractual Clauses. These constitute a contract between Fitch and the respective local company which obligates the data importer to maintain an adequate level of data protection.

How long do we keep your data?

Unless otherwise indicated in this notice, personal data will be deleted as soon as it is no longer required for the above addressed purposes, unless Fitch is required to retain the data for longer.

When you provided your consent for Fitch to keep the demographical information, Fitch will keep this information up to 2 years and after this period, Fitch anonymises your data.

When you provided your consent for Fitch to keep the data longer, Fitch will keep your information up to 2 years to maintain talent pool. You can always withdraw your consent by sending an email to: hr@thefitchgroup.com

Your Rights:

You may, depending on the specific circumstances and your jurisdiction, be entitled to request:

access (data subject access request), obtain informed about how we use your personal data, proper rectification, removal (erasure) or restriction of your personal data as well as data portability. Further, you may have a right to object to the processing, provide and withdraw consent, take legal actions as well as to lodge complaints before the competent data protection regulators.

You may object to the processing of your personal data where the processing is based on a legitimate interest to the extent that such request does not conflict with a legal requirement or obligation to process your personal data, or an overriding legitimate interest we have to process your personal data.

Additional Information for California Residents:

If you are a resident of California, the California Consumer Privacy Act (“CCPA”) or California Privacy Rights Act (“CPRA”) provide certain specific rights regarding your Personal Information. This section describes the CCPA or CPRA rights that you may have and explains how to exercise those rights. You have a right not to receive discriminatory treatment for exercising these privacy rights.

We neither share for targeted advertising nor sell the personal information we collect regarding employees, including sensitive personal information and information associated with individuals under 16 years of age.

- **Right to Access:** To request a copy of the personal information we process in relation to you and to be informed about how we use and share your personal information.
- **Right to Correct:** To request that we update the personal information we process in relation to you, or to correct personal information that you think is incorrect or incomplete.
- **Right to Delete:** To ask that we delete personal information that we process in relation to you where we do not have a legal or regulatory obligation or other valid reason to continue to process it.
- **Right to Portability:** To request a copy of your personal information that you have provided to us in a commonly used electronic format such as through the completion of an application form.

We will not discriminate against you for exercising any of your rights. If you would like to discuss or exercise such rights, please contact us at [hr@thefitchgroup.com]. We will contact you if we need additional information from you in order to honor your requests. For example, we may need to request specific information from you to help us confirm your identity and ensure your right to access the personal information requested, or to exercise any of your other rights. This specific request is intended to ensure that personal information is not disclosed to any person who does not have authority to receive it. You can also use the manage my preferences button on websites and request access, deletion, or to be unsubscribed.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

You may designate an authorized agent to submit your consumer request on your behalf, so long as the authorized agent has your written permission to do so and you have taken steps to verify your identity directly with us. They may submit a request by following the steps noted above.