

## Applicant Privacy Notice

Last Updated: 04 May 2020

PGIM, Inc. and its affiliates comprising Prudential Financial's global asset management businesses ("PGIM") value your trust and are committed to the responsible management, use and protection of personal information. This Applicant Privacy Notice ("**Notice**") describes our practices regarding all the information that we collect in connection with your application for a job or internship with PGIM. Personal information submitted elsewhere on PGIM's web sites will be used in accordance with our general PGIM online [Privacy Statement](#).

### About This Notice

Some of the countries in which PGIM operates have laws related to the collection, use, transfer and disclosure of the personal information of individuals and PGIM is committed to protecting the privacy of our current and potential associates. The purpose of this Applicant Privacy Notice (the "**Notice**") is to give you information about what personal information we collect, use, transfer and disclose, and why.

### INFORMATION WE COLLECT

#### Information You Provide

We may collect the following information from you regarding your application:

- First name, last name, address, telephone number, e-mail address, and other contact information;
- Work authorization status;
- CV, résumé, cover letter, previous work experience, skills, education information, title of qualifications and awards or any other information you elect to provide,
- LinkedIn profile, professional and other work-related licenses or memberships, permits and certifications held, information relating to references;
- Reason for considering leaving current role
- Current Salary / benefits, Salary expectations, Experience level in terms of leading teams, Notice period; and

NOTE: We ask that you avoid submitting the following information which may qualify as sensitive information under applicable law, except where such information is legally required: information on race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings, and veteran status.

Any information you submit must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

#### Information from Other Sources

PGIM may obtain information about you from your references or from a background check report in connection with your application, as permitted by applicable law.

## **USE OF INFORMATION**

We collect and process information about you for the following reasons:

- a) Because you voluntarily provide this information;
- b) Because this information is necessary to take steps at your request prior to entering into an employment or internship;
- c) Because this information is of particular importance to us and we have a specific legitimate interest under law to process it;
- d) To comply with a legal obligation; or
- e) Where necessary to protect the vital interests of any person.

Where the processing concerns information you voluntarily provided to us, or the processing is based on your consent, you may withdraw your consent at any time.

The information that you submit to PGIM will be used for PGIM's global personnel recruitment, management and planning purposes, as permitted by local law, including:

- To process your application;
- To assess your capabilities and qualifications for a job;
- To conduct reference checks;
- To respond to your inquiries and communicate with you about your application;
- To comply with or monitor compliance with any applicable law or regulation;
- To conduct background checks if we offer you a position; and
- To preserve our other legitimate interests, for example, for PGIM's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within PGIM.

The information about you will be stored on a restricted share drive and may be used to consider you for opportunities at PGIM other than the one(s) for which you apply. If you do not wish us to do this, please contact [PGIMHR@pgim.com](mailto:PGIMHR@pgim.com). If we hire you, personal information we collect in connection with your application may be incorporated into our human resources system and may be used to manage the new-hire process; any such information may become part of your employee file and may be used for other employment-related purposes.

PGIM may also use the information as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

However, if you do not provide sufficient information, PGIM may be unable to consider your employment application.

## **DISCLOSURE OF PERSONAL INFORMATION**

PGIM may share personal information with affiliates that are involved in evaluating candidates for a given position. PGIM will remain responsible for personal information that is jointly used with affiliates. We will make the information available to personnel with a business need to know the information, including personnel in the recruiting, human resources and information technology departments, and in the department responsible for the position for which you are applying.

PGIM may share personal information with our third-party service providers who provide services such as recruiting assistance, background check processing, and similar services.

PGIM also may share personal information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to

protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

PGIM may transfer information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Disclosing your personal information may include transferring personal information to other countries (including countries other than where you are based that have a different data protection regime than is found in the country where you are based). If you are located in the European Economic Area (the "EEA") this may include countries outside of the EEA. A list of the affiliate companies that may jointly process your personal information is available upon request (please refer to the 'Contact Us' section at the end of this Notice). Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available at: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)). As for transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your information. You may obtain a copy of these measures by contacting PGIM HR London@pgim.com.

## **DATA RETENTION**

We will retain personal information for the period necessary to fulfil the purposes outlined in this Notice unless a longer retention period is required or permitted by law. We may also retain your information for the purpose of considering whether your skills are suitable for other opportunities. If you do not wish us to do this, please contact PGIMHR@pgim.com. We may remove personal information for inactive accounts from our records, subject to any applicable legal or regulatory obligations. Furthermore, PGIM may delete personal information about you (including your CV/résumé) from our records at any time and without providing any reason. Therefore, please retain your own copy of the personal information provided to us.

## **ACCESS AND CORRECTION**

You may, where permitted by applicable law, request (i) access to personal information we collect, (ii) its modification or suppression, (iii) that we restrict its processing, (iv) that we cease using it (objection right); and/or (v) that we transfer personal information to you or another organization in a structured, commonly used and machine-readable format (right to data portability). Please email us at PGIMHR@pgim.com with any such requests. In your request, please make clear what personal information you would like to access or have changed, whether you would like to have personal information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal information. For your protection, we may only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that certain personal information may be exempt from such access, correction, or suppression rights pursuant to local data protection laws.

You have the right at all times to lodge a complaint with a Data Protection Authority for your country or region or in the place of the alleged misconduct.

## **SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the "Contact Us" section below.

**Please do not send sensitive information to us via email.** It is your sole responsibility to use the appropriate level of care whenever you communicate with us.

PGIM hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed.

## **DIVERSITY**

PGIM is an equal opportunity employer, which means we offer equal treatment to all applicants. PGIM does not discriminate, either directly or indirectly, on the grounds of race, colour, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status or genetic information in any area of recruitment. In some countries we ask for information on the ethnic origin, gender and disability of our applicants for the purpose of monitoring equal opportunity. If you have a disability and would like to indicate as part of your application any relevant effects of your disability and any adjustment which you consider should reasonably be made to the process to assist your application, you are encouraged to disclose this during the application process.

## **USE OF SERVICES BY MINORS**

The Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Information from individuals under eighteen (18).

## **CURRENT PERSONNEL OF PGIM**

If you currently work for PGIM or one of our affiliates, you must be eligible to apply for a different position within PGIM. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs, and HR policies applicable to that position.

## **CHANGES TO THE NOTICE**

We reserve the right to amend this Notice at any time in order to address future developments of PGIM, changes in industry or legal trends. We will provide the revised Notice upon future communication. You can determine when the Notice was revised by referring to the "Last Updated" legend on the top of this Notice. By continuing to use these services, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Notice, in whole or part, you can choose to not continue to apply for the job.

## **CONTACT US**

If you have recruitment questions or requests, please contact us at [PGIMHR@pgim.com](mailto:PGIMHR@pgim.com). Any Privacy related matters should be directed to [pgim.privacy@pgim.com](mailto:pgim.privacy@pgim.com)

## **ACKNOWLEDGEMENT**

By submitting my application, I certify that I have reviewed and understand this Notice as outlined above.