

## **Job Applicant Privacy Notice**

TA Associates Management, L.P. and TA Associates (UK), LLP (together, "we", "us", or "TA")collects and uses your personal data to evaluate your fit for the job you apply for, make hiring decisions, communicate job offers, ensure compliance with equal opportunity laws, and related purposes as further described in this notice ("Privacy Notice"). Please see our <u>Privacy Snapshot</u> below for a high-level overview of our privacy practices.

This Privacy Notice describes how TA collects and processes personal data about you when you apply for a job with TA, how we use and protect this information, and the rights that may be available to you under applicable law regarding this information. "Personal data" refers to information that relates to you or that can be used to identify you.

If you have submitted your application for employment to a TA US office, then TA Associates Management, L.P. is the "data controller" or the "business" responsible for your personal data. If you have submitted your application for employment to TA's UK office, then TA Associates (UK), LLP is the "data controller" responsible for your personal data.

If you accept an offer from TA, your personal data will be used as part of your employee record and will be processed in accordance with a separate employee privacy notice provided to you as part of the onboarding process.

#### YOUR PRIVACY RIGHTS

Under certain circumstances, by law you have the following rights:

- Request access to your personal data (commonly known as a "data subject access request") and receive a copy of it;
- Request that we update or correct your personal data;
- Request erasure of your personal data;
- Request that we stop processing your personal data where we process it relying on a legitimate interest:
- Request that we suspend the processing of your personal data when you have asked us to check its accuracy and in other cases;
- Request to export a copy of your personal data in a format that allow you to reuse your data;
- Withdraw your consent at any time (if applicable);
- **Opt out** of the sale of your information or sharing of your information for interest-based advertising. We do not engage in the sale of your personal information, or the sharing of your personal information for such purposes.
- Lodge a complaint with a data protection authority or regulatory body authorized to hear your concerns, including in your country of residence, place of work, or where you believe an incident took place. For the UK, this is the Information Commissioner's Office or ICO (You can find details about how to do this on the ICO website at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a> or by calling their office on 0303 123 1113). If you reside in the European Economic Area ("EEA"), please click here to find your local data protection authority.

To make these requests, please contact us at <a href="mailto:privacyinquiry@ta.com">privacyinquiry@ta.com</a>. Prior to responding to your requests, we may verify your identity by matching any requested identifying information you provide against the information we have about you. Depending on your jurisdiction, you may designate an authorized agent to make a request on your behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.

## PERSONAL DATA WE HOLD ABOUT YOU

We collect personal data that you provide when you apply for a job. You provide this information voluntarily, and you determine what information to provide. However, some information is required to assess your application, and without sufficient information we may have only a limited ability to evaluate you as a candidate. This personal data includes:

- Contact Information, such as name, address, email address and phone number.
- **Personal Characteristics and Identity Information,** such as ID information and documents, age, place of birth, nationality, details of residency and work permit, gender, language(s) spoken.
- Talent Management Information, such as your job application form, cover letters, resume/CV information, references, employment preferences (including current salary information), professional experience and education (including university degrees, academic records, professional licenses, memberships and certifications, awards and achievements, and current and previous employment details);
- Sensitive Information, such as data on your health, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information related to criminal records or offences where you choose to provide this information during the

- recruitment process.
- Other Information, such as any other personal data that you present us with as part of your application process related to the fulfilment of the role.

We also collect personal data from other sources where relevant and legally permitted, for your application process. These sources may include third party referrals (e.g. a friend of yours who is a TA employee), referees you provide as part of your application, employment research firms, recruiters, identity verification services, and publicly accessible websites, include including job boards and professional networks (for example, LinkedIn). In some circumstances (if permitted by applicable law), we may need to perform a background check relevant to your job, in which case we would receive the results of the background check from the provider. If we do so, we will provide you with notice regarding this use when we collect your personal data and your consent to the background check will be sought at that time if required by applicable law.

Throughout the recruitment process, we may create personal data in connection with the assessment of your application. For example, we may record the views of those considering your application about your suitability for the role for which you have applied and retain interview notes.

#### HOW WE USE PERSONAL DATA

We use your personal data for the following purposes:

- Assessing You and Communicating With You About The Recruitment Process: In the interest of taking steps, at your request, to facilitate entering into a hiring contract with you, we process your personal data to assess your qualifications, experience and capabilities, and how they may align with TA's needs as part of the recruitment process. This includes conducting reference checks where required to verify information you provide. Additionally, we use your personal data to communicate with you about the recruitment process, including providing updates on your application status, scheduling interviews and providing feedback from interviews and assessments. For personal data that we have collected from third-party sources before contacting you (e.g. referrals, recruiters or LinkedIn), we rely on our legitimate interests to assess your suitability for a job role with TA.
- Background Checks: It is in our legitimate interests to conduct background checks on potential hires to ensure the safety and security of our workforce and workplace, where permitted by law. These checks may involve information related to criminal records or offences. In certain circumstances, we may have a legal obligation to carry out such background checks and will inform you when this is the case. Where required by law, we will obtain your explicit consent before conducting these checks.
- Maintaining Our Candidate Talent Pool. It is in our legitimate interests to preserve your personal data as part of our candidate talent pool for the purposes of contacting and considering you when other positions suited to your expertise become available if you have agreed to this. This approach not only allows us to assess your suitability as new opportunities arise but also ensures that we are proactively prepared to match your skills with potential roles, actively supporting your career progression.
- Legal Right To Work. We are required by law to ensure you have a legal right to work in the country where the job role is based.
- Making Reasonable Adjustments/Accommodations. Where required by law or when we have
  obtained your explicit consent, we use your personal data to make reasonable adjustments in our
  recruitment process. This is to accommodate any disabilities or medical conditions you have
  informed us about, ensuring equal employment opportunity for you.
- Equal Opportunities Monitoring. It is in our legitimate interests to conduct equal opportunities

monitoring in connection with our recruitment processes, to promote diversity and inclusion within our workforce. We will process your Sensitive Information (e.g. race or ethnicity data) for these purposes only where required by law or with your explicit consent.

- Keeping Records Related To Our Recruitment Processes. It is in our legitimate interests to maintain records of our recruitment activities. This allows us to keep a history of our interactions for both operational review and continuous improvement of our recruitment practices. Additionally, maintaining these records ensures we comply with legal requirements regarding data retention.
- Sensitive Information. Where required by law (e.g. to make reasonable adjustments) or where you have given us explicit consent to do so, we may process Sensitive Information you provide during the recruitment process for any of the purposes outlined in this Privacy Notice.

#### **DATA SHARING**

### Within the company:

Your personal data may be disclosed to our HR, IT and administration functions for recruitment, administrative and management purposes as described in this Privacy Notice.

## **Service providers:**

We may share your personal data with providers of services to the Company, such as recruitment service providers, hosting, cloud and other IT services providers. We require that these service providers protect your personal data and use the data solely to provide the services to us.

## Other entities in the group:

We will share your personal data within our global offices (as described at https://www.ta.com/global-offices/) for internal administrative purposes related to the management of our workforce (this sharing is in our legitimate interest).

#### Other third parties:

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business, or to relevant third parties such as auditors, lawyers or professional advisors, our insurers.

We may also disclose your personal data to comply with a subpoena, bankruptcy proceedings, or similar legal process, or in response to lawful requests by public authorities, or when we believe in good faith that disclosure is reasonably necessary to protect our property or rights, or those of you or third parties, or the public at large.

#### **DATA TRANSFERS**

If you reside in the UK, European Economic Area ("EEA") or Switzerland, your personal data may be transferred outside of these regions to countries that may not offer an equivalent level of data protection. This includes transfers to our service providers and our affiliate companies globally, such as in the US, Mumbai and Hong Kong. Where required under applicable law, we provide adequate protection for the transfer of your personal data, including by relying on adequacy decisions issued by the European Commission or the UK authorities, entering into contractual agreements using standard contractual clauses approved by these authorities, or obtaining your explicit consent where required and appropriate. Please contact <a href="mailto:privacyinquiry@ta.com">privacyinquiry@ta.com</a> if you would like to receive more information on the ACTIVE/131656383.2

safeguards we have implemented for the transfer of your personal data.

#### **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know are subject to confidentiality obligations.

#### **DATA RETENTION**

We generally retain your personal data only for as long as necessary to fulfil the purposes outlined in this Privacy Notice. This includes the time needed to evaluate your suitability for specific job roles and where you have agreed to this, to maintain your information in our candidate talent pool to ensure you are considered for future opportunities that match your expertise. We also retain your data to comply with our legal obligations and to protect our legal interests in recruitment matters. To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of the personal data, the purposes for which we use the personal data and whether we can achieve those purposes through other means, any permissions you give us with regards to your personal data, and the applicable legal and regulatory requirements.

If you are successful in becoming employed by us, we will keep your personal data in line with the employee privacy notice we provide to you.

## **EQUAL OPPORTUNITY EMPLOYER**

TA is an equal opportunity employer and complies with all applicable federal, state, and local fair employment practice laws. TA strictly prohibits and does not tolerate discrimination against applicants, employees, or any other covered person because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including gender, pregnancy, sexual orientation, and gender identity), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, or any other characteristic protected under applicable federal, state, or local law. All TA employees, other workers, and representatives are prohibited from engaging in unlawful discrimination. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, promotion, discipline, compensation, benefits, and termination of employment.

Applicants with disabilities may be entitled to reasonable accommodation under the Americans with Disabilities Act, the Massachusetts Fair Employment Practices Act, and all applicable state or local laws. A reasonable accommodation is a change in the way things are normally done which will ensure an equal employment opportunity without imposing undue hardship on TA. Please contact privacyinquiry@ta.com if you need an accommodation with respect to this policy or to otherwise participate in the application process.

If you are subjected to any conduct that you believe violates this section, please promptly contact privacyinquiry@ta.com as soon as possible after the offending conduct.

#### ALTERNATIVE FORMATS FOR EMPLOYEES WITH DISABILITIES

Upon request, this notice is available in alternative formats, such as large print, braille, or audio. Please contact privacyinquiry@ta.com, and an alternative format will be provided to you so you can access the information in this Privacy Notice.

## **QUESTIONS**

If you have any questions, please contact us at <a href="mailto:privacyinquiry@ta.com">privacyinquiry@ta.com</a>.

## CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time. The most current version is available to you on the TA website. If we make material changes to this Privacy Notice, we will notify you prior to the change becoming effective.

# **Privacy Snapshot**

Below is a high-level snapshot of how we collect, use, and disclose your personal information, but you need to read the entire Privacy Notice for complete information.

Data Categories Collected	How We Collect	Primary Purposes of Processing	Key Recipients/Disclosures	Can You Limit Sharing?
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, IP address, email address	When you apply for a job with us; from other sources described in the "Personal Data We Hold About You" section of the Privacy Notice	To process your job application, and as described in the "How We Use Personal Data" section of the Privacy Notice	Service providers	No
Personal information categories listed in the California Customer Records Statute (e.g., name, contact details)	When you apply for a job with us; from other sources described in the "Personal Data We Hold About You" section of the Privacy Notice	To process your job application, and as described in the "How We Use Personal Data" section of the Privacy Notice	Service providers	No
Professional or employment- related information	When you apply for a job with us; from other sources described in the "Personal Data We Hold About You" section of the Privacy Notice	To process your job application, and as described in the "How We Use Personal Data" section of the Privacy Notice	Service providers	No
Characteristics of protected classifications under California or federal law	When you apply for a job with us	To process your job application, and as described in the "How We Use Personal Data" section of the Privacy Notice	Service providers	No

Sensitive personal information (as defined in CA Civil Code 1798.140 (ae))	When you apply for a job with us	To process your job application, and as described in the "How We Use Personal Data" section of the Privacy Notice	Service providers	No
		Notice		

<sup>\*</sup>As described further in our Privacy Notice, we may disclose all categories of personal information to our affiliates, and professional advisors for the purposes described in the Privacy Policy. We also may disclose personal information to authorities and others for legal and compliance purposes, and business transferees in the context of an acquisition or the sale of our business or another corporate transaction.