



Gallagher

Insurance | Risk Management | Consulting

Gallagher – Data Privacy Statement for Job Applicants

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Introduction

This Privacy Statement (“Privacy Statement”) describes the handling of personal information obtained from and about job applicants or potential job applicants. It applies to personal information submitted directly by you as well as by third party agencies and recruiters on your behalf.

This Privacy Statement describes the practices of the Gallagher entity to which you are applying for a job opening (as identified in the relevant advertisement) and to any affiliates, subsidiaries and related companies (which are collectively simply “Gallagher” in this statement).

Collecting your information

Information we collect directly from you

In the course of your application being submitted, Gallagher will receive and hold your personal information, which may include ‘sensitive’ personal information depending on the nature of your application, such as:

- I. contact information such as your name, home address, email address or phone number;
- II. information contained in your resume or CV, and other documents related to the application or recruitment process such as a cover letter, references, transcripts, licensing information, certifications, and similar items;



- III. information about your visa status and authorization to work in the relevant jurisdiction;
- IV. contact information for your referee(s) (it is your responsibility to obtain your referee's permission before providing their personal information to Gallagher);
- V. demographic information including your age and gender, and where applicable and in accordance with applicable law, your ethnicity, disability or veteran status;
- VI. details relating to any criminal history, in accordance with laws applicable to the relevant jurisdiction;
- VII. information required for aptitude, personality or specific skill assessments; and
- VIII. any other information you choose to provide to Gallagher in connection with your application.

Information we may collect from other sources

- I. background check information from employment screening agencies, recruitment agencies or publicly available registers as allowed by local law; for example, address history, work experience or employment history, social security number or other national identifier, date of birth and gender;
- II. criminal and credit history, education, employment verification, FCA references, directorship search, public safety verification, professional qualifications;
- III. publicly available and membership-only available professional profiles on websites or social media (for example, LinkedIn); and
- IV. training records from educational, licensing, and professional bodies

Gallagher may be required by law to collect certain personal information about you, or as a consequence of (or to enter into) any contractual relationship Gallagher has with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. Gallagher will inform you at the time your information is collected whether certain data is compulsory and the consequences of the failure to provide such data.

If you are a resident of California, you are a California "consumer" as defined in the California Consumer Privacy Act of 2018 (CCPA), and we are required to provide you with a list of the categories of personal information that we have collected about California consumers in the preceding 12 months by reference to the enumerated categories in the definition of "personal information" contained in the California Consumer Privacy Act of 2018. Please refer the table below. Note that not every category of personal information Gallagher collects about California consumers is necessarily collected from or about California employment applicants.



Category	Examples	Collected	Information Collected	
			From You	From Other Sources
A. Identifiers.	A real name, alias, postal address, unique-personal identifier, online identifier, Internet Protocol address email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes	I III IV	I
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number. Some CCPA Covered Personal Information included in this category may overlap with other categories.	Yes	I II IV	I II
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, national origin, citizenship, religion or creed, marital status, physical or mental disability.	Yes	V	I
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	N/A	II
E. Biometric information.	Behavioral characteristics	Yes	VII	N/A
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	No	N/A	N/A
G. Geolocation data.	Physical location or movements.	No	N/A	N/A
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No	N/A	N/A
I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	Yes	II	II

J. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes, abilities and aptitudes.	Yes	VII	N/A
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Using your information

Gallagher will use the information you have provided for the following purposes:

- considering your general and specific suitability for employment, including by assessing your aptitude and skill set;
- verifying the information you have provided, including by conducting screening (including background screening);
- arranging interviews;
- where applicable, providing an offer of employment;
- contacting you with details of future roles which may be of interest to you;
- complying with employment law obligations; and
- undertaking general statistical analysis and reporting, including candidate activity and demographic reports.

Should you become an employee of Gallagher, any personal information you submit through the application process will be used in connection with your employment as set out in your contract of employment, internal policies and procedures and as permitted by applicable laws.

In most cases our basis for processing your personal information will be one of the following:

- to comply with Gallagher's legal obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering obligations or obtaining proof of your right to work status to enable us to meet relevant obligations;
- to comply with Gallagher's legal obligations to you (including, for example, health and safety or anti-discrimination obligations that Gallagher must comply with) or to a third party (including tax authorities, health insurance providers, social security agencies or other governmental or quasi- governmental authorities); or
- to meet Gallagher's legitimate business operational needs and interests, for example to manage Gallagher's potential employees effectively and protect Gallagher against theft or other crime. When Gallagher processes personal information to meet Gallagher's legitimate interests, Gallagher put in place reasonable safeguards to ensure that your privacy is protected and that Gallagher's legitimate business operational interests are protected.

Gallagher may obtain your consent to collect and use certain types of personal information when Gallagher is required to do so by law (for example, in certain jurisdictions where consent is always required to collect personal information, in relation to our direct marketing activities, “cookies,” and Tracking Technologies or when we process sensitive personal information). If Gallagher requests your consent to process your personal information, you may withdraw your consent at any time after giving it by contacting us using the details at the end of this Privacy Statement.

Automated Decisions

In limited circumstances, some Gallagher entities may automatically process your personal information to make decisions or conduct 'profiling' about you for Gallagher's recruitment purposes. This means Gallagher may process your personal information using software designed to evaluate your available personal information and determine your suitability and eligibility for general or specific employment. The significance of Gallagher's actions in this connection is that it may have legal or similar effects for you, namely whether you are offered employment with Gallagher.

Gallagher will only make these kinds of automated decisions about you where:

- such decisions are necessary for entering into a contract. For example, Gallagher may decide not to offer you a role based on information that demonstrates ineligibility for employment.
- such decisions are required or authorized by law, for example for fraud prevention purposes; or
- you specifically consent to Gallagher carrying out automated decision-making.

Subject to local legal requirements and limitations, you can contact Gallagher to request further information about automated decision-making, object to Gallagher's use of automated decision-making, or request an automated decision to be reviewed by a human being.

Gallagher does not rely on or use automated decision-making based on your personal information to make significant employment-based decisions.

Sharing your information

The Gallagher entity to which you are applying for a job opening (as identified in the relevant advertisement) is the “controller” responsible for the personal information Gallagher collects and processes and its Data Protection Officer can be contacted at the details below.

Gallagher works with and may share your personal information with carefully selected third parties who provide various services to Gallagher, these include:

- providing background checks including credit or criminal check verification services (to the extent that such checks are permitted under applicable law);
- recruitment and selection;

- professional, elective, and mandatory training;
- IT services such as website management, data analysis and data backup; and
- security and storage services.

Where this occurs Gallagher takes reasonable and appropriate technical, administrative and physical steps to keep your personal information secure. Where required, your personal information may also be disclosed to law enforcement, regulatory or other government agencies or third parties to comply with legal or regulatory obligations or requests. To the fullest extent permitted by applicable law, Gallagher disclaims all liability arising from the use of your personal information by third parties. In all cases, data transfers will be logged and documented, identifying the recipient of the data, the purpose of the transmission, and the type of data that was transmitted. Where permitted by law, Gallagher can, on request, confirm the name of each third party that personal information is, or will be, transferred to.

Gallagher is part of a global group of companies and, for recruitment and employment purposes, may use resources and servers located in various countries around the world to access, store or process your personal information, including outside the European Economic Area (EEA) or the jurisdiction in which you reside. See the section on "International Data Transfer" below for more information.

Retaining your information

Gallagher will retain your personal information in accordance with its statutory obligations and internal policies and procedures.

If your application is successful, Gallagher will retain your personal information for as long as is required by law and necessary for employment administration purposes.

If your application is unsuccessful, Gallagher may retain your personal information for a reasonable period of time in respect of Gallagher's legitimate business purposes and potentially to contact you about other relevant employment opportunities. If you have applied via our "Careers" websites, we will generally delete your information two years after your last contact with us. Please let us know during the application process or by using the contact details address below if you do not want your personal information to be retained in order to be notified about future employment opportunities.

International Data transfer

Where you are based within the European Union you should be aware that your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law.

Where you are based outside of the European Union, you should be aware that your personal information may be transferred to, stored, and processed in a jurisdiction that is not your home jurisdiction. You consent to the transfer, disclosure, storage and/or processing of your personal information outside the jurisdiction in which the information was originally collected.



Gallagher implements reasonable safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal information is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

Your rights and responsibilities

You are responsible for ensuring that the personal information and information you submit is accurate and up to date, as any incorrect information may invalidate your application and, where applicable, any offer of employment. In addition, you may have certain rights (subject to local law) regarding your personal information, these include rights to:

- access your personal information;
- request proof of the authorization or previous consent given to us to perform the collect and processing of the personal information;
- correct errors in the information Gallagher holds about you;
- erase your personal information;
- restrict Gallagher's use of your personal information;
- object to Gallagher's use of your personal information;
- request information about the use and processing of your information by AJG Group;
- revoke the consent given by you for the processing of your personal information;
- lodge a complaint with your local data protection authority; and
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability).

If you require more information about how your personal information is used or would like to review, update, delete or request access to your personal information please contact GallagherCareersSupport@ajg.com.

Gallagher is committed to working with you to obtain an appropriate and fair resolution of any complaint or concern about privacy. If, however, you believe that Gallagher not been able to assist with your complaint or concern, you may have the right to make a complaint to your local data protection authority.

As provided by the amendments to the CCPA, if you are a resident of California, you will not be able to exercise CCPA consumer rights for access, portability, or erasure with respect to your personal information collected and used by us within the context of your application for employment until January 1, 2021. Note that we do not sell consumer personal information and



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we do not discriminate or retaliate against California consumers who exercise their CCPA consumer's rights, as those terms are defined in the CCPA.

Contact us

If you have questions or concerns regarding the way in which your personal information has been collected, stored, used or disclosed, please contact us at GallagherHRCompliance@ajg.com or please contact the person you have been in touch with regarding your employment.

Our Data Protection Officer can be contacted at: GallagherEthicsandCompliance@ajg.com.

Changes to this Privacy Statement

This Privacy Statement may be updated periodically to reflect changes in Gallagher's personal information practices or applicable laws. The current version is available on Gallagher's website located at ajg.com/applicant-privacy. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, Gallagher will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to those changes).

Effective Date: January 1, 2020