

# Candidate Privacy Notice

**At ClearBridge, we care about your privacy and value the trust you place in us when you share your personal information.**

This notice is for Candidates, defined as any job applicant for full or part-time employment, including current employees or individuals contracted for employment related services, such as but not limited to temporary staff, interns, contractors, and consultants. ClearBridge currently recruits using agencies, search firms, employee referrals, as well as directly.

If you chose to apply, we recommend that you review this Privacy Notice.

From time to time, we may update this notice and any new version is always available on our website:

[Site Usage & Accessibility | ClearBridge Investments](#)

The entity responsible for the collecting and processing of your personal information will usually be the ClearBridge entity where you apply.

Our entities and office locations are available at:  
[www.clearbridgeinvestments.co.uk/contact-us](http://www.clearbridgeinvestments.co.uk/contact-us)

## 1. Web-related privacy issues

### External links

Our website may contain links to third-party websites or content, over which we have no control. Please review the privacy notices of these third-party sites for their privacy practices and the way they manage your personal information.

### Cookies and similar technologies

Some of our web pages may contain cookies (a text file which identifies your device to our network) and/or web beacons, clear GIFs, tags or pixels (electronic image files that track navigation through our sites) placed by ClearBridge or third-party advertisers.

For simplicity, we refer to all these technologies as "cookies." We also do not look for web browser "do not track" signals.

### How do we use cookies?

We may use cookies to customize content and advertising, provide social media features, see how visitors navigate our website and to improve the services we offer you.

We may also engage third party tracking and advertising providers to act on our behalf to track and analyse your usage of our website using cookies. These third parties collect, and share with us, usage information about visits to our website and may correlate this information with other information (e.g. your IP address) to track page usage, help us target our recommendations and advertising and measure and research the effectiveness of our advertisements.

### Enabling and Disabling Cookies

You can learn more about the cookies we use and choose which cookie categories you wish to allow by visiting the "Change Cookie Settings" on our website:

[Site Usage & Accessibility | ClearBridge Investments](#)

## 2. Privacy notice

This notice describes the categories of personal information we collect and for which purposes. By personal information, we mean information that is reasonably capable of being directly associated to you or in other ways be reasonably linked, directly or indirectly, to you.

### Personal information we collect

Your personal information is either provided by you, created by us (or on our behalf) in connection with your candidacy, or obtained from third parties. If you are offered employment with us, please refer to our Employee Privacy Notice. This link is only accessible, if you are on an Alcentra/Franklin Templeton device or within the ClearBridge/Franklin Templeton network. Former employees may contact Human Resources for a copy of the Employee Privacy Notice.

### We may collect the following types of personal information:

- **Background screening/pre-employment check information** such as tax or government identification documents and/or numbers, immigration status/work eligibility, birthdate, other information necessary to conduct screenings and results of background screenings and professional references;
- **Biometric and/or pictorial information** such as photos identifying you that you voluntarily provide and/or fingerprints when required due to a job position;
- **Contact information** such as name, phone number(s), postal/home address, and email addresses;
- **Information about your use of company premises** such as a visitor log which may contain the time, location and purpose of your visit. ClearBridge offices contain landlord-controlled closed-circuit television (CCTV);
- **Information captured by our websites** such as web logs, cookies, and information about your interactions with our websites and ClearBridge webpages on social media sites such as Twitter and LinkedIn;
- **Employment qualification information** such as your curriculum vitae (CV)/resume which may include your expertise, training, education, employment history and performance details, special skills (e.g. languages), employment eligibility, professional or industry affiliations, and securities industry license information;
- **Other information collected or generated in connection with your prospective employment** such as compensation and bonus expectations, communications connected to potential employment and interviews (emails, calls, instant messenger (IM) chats/texts).

## Sources of personal information

We may collect personal information from the following sources:

- From you directly or from those acting on your behalf
- Another person (typically someone who knows you) who provides referral information about you to us
- Automatically collected from Internet or other network activity, internal monitoring activities, or CCTV
- Other parties that perform services for us or on our behalf
- Publicly available sources of information

## Why do we collect your personal information?

Your personal information is collected (including sharing such information with third parties) in order to:

- Fulfil a contract we have with you;
- When it is our legal duty;
- When you consent to it;
- When it is in our legitimate interest\*

\*Our legitimate interest is when we have a valid business or commercial reason to use the information and the use does not negatively impact your personal rights and freedoms.

## How we use your personal information

We may use your personal information for the following purposes:

- facilitating Human Resources (HR) functions and administration;
- evaluating your application, qualifications, and eligibility for employment;
- verifying the accuracy of information provided and conducting background screening and reference checks;
- communicating with you regarding your candidacy;
- alerting you to job opportunities and/or vacancies (you can unsubscribe or withdraw your consent to these alerts);
- planning and monitoring recruitment campaigns;
- aggregating diversity information for improving diversity and inclusion programs;
- monitoring access to and security of company premises;
- business management and other legitimate business purposes in compliance with our policies and procedures, or as otherwise permitted or required by law.

## Diversity monitoring

We may collect information about you in accordance with our diversity and inclusion commitments and in accordance with local laws. Where diversity monitoring is conducted with your consent, it may be withdrawn at any time. This information helps us understand our Candidate demographic better, target initiatives to Candidates more effectively and send out a strong and positive signal that diversity and inclusion are important to ClearBridge. Dependent on the country of candidacy for employment, the information we may collect could include but not limited to: age, gender, gender identity, sexual orientation, social mobility, disability status, military status, and ethnicity.

This information will be used by ClearBridge solely to analyze Candidate and workforce diversity in connection with our commitment to diversity and inclusion. We will not use it to make decisions about your potential employment relationship with us.

## Data Retention and Protection

We keep your personal information for as long as necessary in connection with the purposes identified within this notice, and for a reasonable period thereafter, in accordance with local retention periods. In general, Candidate information is retained for one year.

In certain circumstances, data may be retained for a longer period of time, for example, where we are in ongoing correspondence or there is a continuing claim or investigation.

Our web logs are kept for 60 days for security reasons.

We have implemented reasonable administrative, technical, and organizational measures, including physical, electronic, and procedural safeguards, based on our Corporate Information Security policy, which is designed to secure your personal information. For example, access to your personal information is limited to authorized employees, and authorized employees are required to follow specific procedures with respect to maintaining the confidentiality of your personal information.

## Information We Share

Your personal information may be transferred to, and stored, outside the country where you apply for employment, within our group of companies and/or service providers. Please refer to Third parties and other recipient categories for the categories of potential third-party recipients.

ClearBridge has offices in the following countries: Australia, Luxembourg, Singapore, United Kingdom, and the United States.

ClearBridge is part of the Franklin Templeton group of companies which has offices in: Argentina, Australia, Bahamas, Canada, China, Cayman Islands, Dubai International Financial Centre (DIFC), Countries within the European Economic Area, Hong Kong, India, Israel, Japan, Korea, Malaysia, Singapore, South Africa, Switzerland, Turkey, United Arab Emirates, United Kingdom, and the United States. A full list of FT companies is available at:

[www.franklintempletonglobal.com/privacy/fund-entities](http://www.franklintempletonglobal.com/privacy/fund-entities)

Some of these countries may not have the equivalent level of data protection laws as those in your location. If we need to transfer your personal information internationally, we will take steps to make sure that it is protected and safeguarded.

In addition to sharing the information with other ClearBridge group companies and third parties, we may disclose or transfer your personal information to a prospective or actual purchaser or transferee, in the event that a ClearBridge or Franklin Templeton company or its assets is / are merged or sold, or a sale or transfer is intended.

## Your Privacy Rights

You may have the following rights, under certain circumstances, in relation to your personal information:

- Ask whether ClearBridge has personal information about you and for what purpose and if it is disclosed to third parties;
- Access to your personal information including copies of that information;
- Rectify inaccurate/incomplete personal information about you;
- Request deletion of your personal information;
- Raise a complaint to a supervisory authority;
- Additionally, you may have the right to request a restriction, objection or data portability.

If you wish to exercise a right, [download our Privacy Rights Request form](#).

The information will be provided free of charge, except where local laws allow for charges.

## 3. How to contact us

Contact us at one of the following addresses to exercise a privacy right, ask a question, share a concern, or make a complaint regarding this notice and/or our privacy practices: [compliancehelpdesk@clearbridge.com](mailto:compliancehelpdesk@clearbridge.com)

FAO: Legal team  
ClearBridge Investments  
5 Morrison Street  
Edinburgh EH3 8BH  
United Kingdom

## 4. Third parties and other recipients

The following categories of third parties which may be associated with your Employment relationship with us:

- **Account Processing System suppliers** – provide services or maintain systems processing account information (candidate applications), such as suppliers systems supporting ClearBridge's Website.
- **Benefits, Pension and Insurance Providers** – provide services or benefits on ClearBridge's behalf, for Employees, pursuant to the Employment contract.
- **Business Contact database administrators** – provide services or maintain business contact databases, and systems processing business contact information, such as suppliers' systems supporting ClearBridge's Website(s).
- **Cloud-based solution providers** – provision of services such as Translations services and Training solutions.
- **Courts/Police, Regulators & Tax Authorities** – Competent third-party authorities (government bodies) where requested, required by law, or where we consider it necessary, information may be shared.
- **Document Archive, Storage and Destruction Suppliers** – offsite document archive and storage services.
- **Employee Representative Bodies** – A group of Employees elected to represent the workforce to senior management or the Executive Committee in a particular country, in accordance with local laws.
- **Events Management Providers** – provide services to plan, organise and facilitate events.
- **IT Systems Suppliers** – provide technical services specifically for IT systems.
- **Payroll Providers** – provide services for set up and payment of Employees.
- **Print Services Suppliers** – provide technical services specifically for print services.
- **Professional advisors, i.e. auditors and lawyers** – Third parties who provide professional and/or legal services to ClearBridge and Franklin Templeton group companies
- **Recruitment Providers** – provide recruitment services.
- **Security** – provide services to monitor ClearBridge's physical premises.
- **Social Media Providers** – support ClearBridge web pages, such as Twitter and LinkedIn.