

Recruitment Privacy Notice

What is this notice?

This is the 'Recruitment Privacy Notice' of AXIS group. Our contact details are: dpo@axiscapital.com. This notice applies to individuals applying to work with us, including prospective employees, workers and contractors.

We are a data 'controller', which means we are responsible for deciding how we hold and use your personal information. This notice explains how and why we will collect and use your personal information in the context of the recruitment process and your rights in relation to your personal information. We may amend this notice at any time.

Data Protection Officer

We have appointed a Data Protection Officer (DPO). If you have any questions about this privacy notice or how we handle your personal information please contact the DPO. They can be contacted via the dedicated email address: dpo@axiscapital.com or by calling +44 207 877 3800.

Your personal information

In this privacy notice, 'your personal information' means your personal data i.e. information about you from which you can be identified. The appendix to this notice lists 'your personal information' that we may process.

Your 'personal information' does not include data where the identity has been removed (anonymous data). It is important that your personal information is accurate and up to date. Please update your personal information in the AXIS Career Site (Workday) if it changes during the recruitment process.

Special categories of personal information

'Special categories of personal information' means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purpose of uniquely identifying you.

Data marked * in the appendix to this notice falls within these 'special categories' or might disclose special categories of personal information. We must have additional legal grounds for processing special categories of personal information, and these grounds are set out in the appendix to this notice.

Where does your personal information come from?

Your personal information will come from you or us, and may also come from the following sources:

- Recruitment agencies may provide us with personal information including your name, CV, contact and home and/or email address details.
- Background check providers may provide us with personal information including spent and unspent convictions, police records of convictions, cautions, reprimands and warnings, previous names, date and place of birth and gender.
- Credit reference agencies may provide us with personal information including your date of birth, passport details, sex, nationality, credit scores and details of previous bankruptcy,
- Former employers or other referees, whom you have given us permission to contact, may provide us with personal information and information regarding past employment.
- Medical professionals may provide us with personal information concerning any medical conditions or medical causes of concern.
- Professional bodies that confirm membership / qualifications / training may provide us with the following personal information such as grade of qualification received, date of birth, name and surname.

If you would like more information on the source of your personal information please contact the DPO.

Processing your personal information

We may process your personal information during and after your recruitment process with us. This may include collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

In general, we process your personal information for the reasons, and on the legal grounds set out in the following table, and also to:

- Retain records relating to the recruitment process;
- Establish, exercise or defend legal claims;
- Comply with the law or requirements of a regulator

Information about criminal convictions

To enable us to make recruitment decisions and assess suitability for particular work, we may process information about criminal convictions and offences (including alleged offences) as described in this section.

We will process this information to enter a contract with you, to comply with a legal obligation, for our legitimate interests (in selecting suitable employees, workers and contractors), and to exercise or perform employment law rights or obligations.

If you have applied for one of the following roles, we will request the following information at the application stage:

- Senior Management or regulated roles for confirmation as to whether you have any unspent criminal convictions regarding dishonesty to meet regulatory requirements.

Regulated roles will be subject to a satisfactory criminal record checks for the following reasons:

- We are legally required as per statutory and regulatory requirements to carry out a standard or enhanced disclosure check;
- Regulatory roles require a high degree of trust and integrity

Data necessary for the contract

The table in this document's appendix identifies personal information that we may need to enter a contract with you. If you don't provide this data, we may not be able to proceed with the recruitment process or enter into the contract.

Statutory requirement to provide your personal information

In some circumstances, the provision of your personal information is a statutory requirement. This includes:

- Documentation confirming your right to work in the applicable country – if you don't provide this, we may not be able to enter into a contract with you.

- The information regarding criminal convictions described in the appendix of this document, where we have stated that this is a statutory requirement.

Sharing your personal information with third parties

We may share your personal information with the following third parties if this is required by law; necessary to enter or carry out our contract with you or administer the working relationship with you; where we have another legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person:

- The authorities in the country in which you work or live to whom we are obliged to provide information about the amounts we pay you (such as tax and social security authorities);
- The authorities in the country in which you work who deal with health and safety Other entities in AXIS group (e.g. AXIS Re SE, AXIS Specialty Europe SE and Novae Management Limited) as part of our regular reporting activities on company performance for regulatory or statutory purposes, in the context of a business reorganisation, group restructuring exercises, for system maintenance support and hosting of data.
- Health professionals and occupational health providers involved in your care;
- Potential or actual purchasers of the business, or other third parties in the context of a possible sale or restructuring of the business;
- Organisational regulators such as the Central Bank of Ireland, Financial Conduct Authority, Prudential Regulation Authority, Lloyd's of London, Financial Ombudsman Service and Information Commissioner's Office.
- Our professional advisors e.g. Gateley Plc, Brodies LLP, Ernst & Young, KPMG, Pricewaterhouse Coopers
- Our service providers, including IT service providers; payroll and pension administrators; and those involved in providing benefits in connection with your employment or engagement;
- Public: for business promotion, we may share details of your name, work location, professional memberships and qualifications, and photographs of you;
- Any person specified by you, where you ask us to provide a reference to that person;
- Other third parties as necessary to comply with the law.

Automated decision-making

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

Transferring your personal information outside the EU

We may transfer your personal information to other companies in our group and our suppliers in the United States, Bermuda, India, Singapore, Dubai, and the Philippines. We do this for management purposes, reporting activities on company performance for regulatory or statutory purposes, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data.

To ensure appropriate safeguards for your personal information, we have put in place contracts with the recipients of your personal information in a form approved by the European Commission for transfers outside the EU. If you would like to find out more about the safeguards we have put in place, please contact our DPO (dpo@axiscapital.com).

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting or reporting requirements.

We will retain all of your personal information during your engagement and for a maximum of 6 years after termination to allow us to establish, exercise or defend legal claims

Your rights

You have the following rights:

- **Access:** you can request a copy of your personal information that we hold, and check we are processing it lawfully.

- **Correction:** you can ask us to correct your personal information if you don't think it is accurate, complete or up-to-date.

- **Deletion:** you can ask us to delete your personal information, if:
 - it is no longer necessary for the purposes for which we obtained it;
 - you withdraw your consent, and we have no other legal basis for the processing;
 - you validly object to the processing as described below;
 - we have unlawfully processed the data; or
 - we must delete the data to comply with a legal obligation.

- **Objection:** if we process your personal information to perform tasks carried out in the public interest or on the basis of legitimate interests, you can object to this processing on the basis of your particular situation. We will only then continue the processing if we have overriding legitimate grounds for this, or the processing is to establish, exercise or defend legal claims. You may also object if we process your personal information for direct marketing purposes.

- **Restriction:** you can ask us to restrict our processing of your personal information if:
 - you contest the accuracy of the data (for a period that enables us to check it);
 - our processing is unlawful, but you don't want the data deleted;
 - we no longer need the data, but you require it to establish, exercise or defend legal claims; or
 - you have objected (as above) and are awaiting confirmation as to whether we have overriding legitimate grounds for processing.

- **Transfer:** if our processing is based on your consent or necessary to carry out our contract with you, and is carried out by automated means, you can request a copy of the personal information

you have provided to us and the transfer of this to someone else. Where technically feasible, you can ask us to transfer it directly.

- **Complain to a European Union Data Protection Commissioner:** each EU country has a Data Protection Commissioner with supervisory authority for data protection issues. We aim to resolve all complaints internally via our DPO who can be contacted at dpo@axiscapital.com above, but you do have the right to complain to the appropriate Information Commissioner at any time.

Please contact our DPO if you require more information on these rights, or wish to exercise any of them. Our Worker Privacy Notice and Data Protection Policy has more information on these rights and explains how you can exercise them.

Reason for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
Contact you regarding the recruitment process and any offer of work	<p>To enter a contract</p> <p>As part of a screening interview process (including telephone interviews)</p> <p>To discuss details of potential employment with the Company (salary expectations, to discuss plausible start dates and notice periods, availability to attend interviews)</p> <p>To make suitable interview arrangements.</p>	Personal contact details (including name, address, email, telephone number)
Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work	<p>To enter a contract</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • to select suitable employees, workers and contractors 	<ul style="list-style-type: none"> • Your application form, CV, any covering letter or email, and interview notes • Results of recruitment tests (if applicable)
<p>If you have accepted an offer of work from us that is subject to such checks:</p> <ul style="list-style-type: none"> • Take up references (from referees whom you have 	<p>To enter a contract</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • to select suitable employees, workers and contractors 	<ul style="list-style-type: none"> • References and details of previous employers • Professional memberships, registrations and

<p>given us permission to contact);</p> <ul style="list-style-type: none"> • Carry out background checks; • Carry out credit checks; and • Confirm your professional memberships, registrations and / or qualifications. 		<p>qualifications</p> <ul style="list-style-type: none"> • Correspondence and results regarding the following background checks: financial checks due to regulatory requirements, past employment references, • Results of credit check
<p>Determine the terms of any potential contract between you and us</p>	<p>To enter a contract To comply with a legal obligation</p>	<p>Offer letter, and proposed contract between you and us</p>
<p>If you have accepted an offer of work, check you are legally entitled to work in the applicable country</p>	<p>To enter a contract To comply with a legal obligation</p>	<p>Documentation confirming your right to work in the applicable country (passport, Visa(s), Employee ID)</p>
<p>Establish whether you can undergo an assessment which forms part of the application process</p> <p>Consider reasonable adjustments to the recruitment process for disabled applicants</p>	<p>To enter a contract To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • To select suitable employees, workers and contractors <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> • To exercise or perform employment law rights or obligations 	<p>Information about a disability, the effects of that disability, and special arrangements that may need to be made to the recruitment process as a result of that disability*</p>
<p>Establish whether you will be able to carry out a function that is intrinsic to the particular work</p>	<p>To enter a contract To comply with a legal obligation</p> <p>For our legitimate interests:</p>	<p>Health data and sickness records, including disability information*</p>

<p>If you have accepted an offer of work from us that is subject to such a check: assess your fitness to work via a health questionnaire or medical report</p>	<ul style="list-style-type: none"> • To select suitable employees, workers and contractors <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> • To exercise or perform employment law rights or obligations • For the purposes of preventive or occupational medicine, or for the assessment of your working capacity 	
<p>Carry out equal opportunities monitoring</p>	<p>For our legitimate interests:</p> <ul style="list-style-type: none"> • To review equality of opportunity or treatment <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> • To review equality of opportunity or treatment • To exercise or perform employment law rights or obligations 	<p>The following information you may have provided via our equal opportunities monitoring process:</p> <ul style="list-style-type: none"> • Health data, including disability information* • Age and date of birth • Marriage or civil partnership status* • Gender • Data revealing race, religious beliefs or sexual orientation*