Brambles Applicant Privacy Notice

Brambles Ltd and its affiliates including its companies operating under the CHEP, IFCO, BXB Digital, and Kegstar brands (collectively, “Brambles” or “we” or “our” or “us”), respect your right to privacy and your right to control the dissemination of your personal information. Please click here for a list of our business locations and contact information.

This Applicant Privacy Notice (“Notice”) explains how Brambles uses personal information about you in our recruitment process.

The personal information you provide will be used and processed by or on behalf of the Brambles hiring entity identified in the job posting and will be processed in accordance with this Notice. Additionally, if you elect to join our Talent Network or request to be considered for other job opportunities, your information will be used and processed by us or on our behalf to consider you for other Brambles’ job opportunities.

By visiting our Career Portal (“Portal” or “Website”) and/or using the services offered on or through the Portal, you acknowledge you have read and understood the terms of this Notice. This Notice is incorporated into, and part of, the Terms and Conditions of our Portal, which governs your use of the Portal.

1. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following information about you:

1.1. Contact Information

If you choose to use the Portal, we will ask you to provide us with some basic information about you— including your name and email address— which enables us to provide services and information to you, and helps make our contact with you as productive as possible.

If you elect to join our Talent Network, you will have the option of providing additional information— including areas of interest, city, state, country, and whether you are open to relocation— which enables us to better identify job opportunities that may be of interest to you.

Subject to your preferences, collected at the time you submit your application for a specific job or elect to join our Talent Network, we may contact you about other job opportunities. You have the right to "opt in" and "opt out" of these communications.

1.2. Employment Information

Brambles may collect various types of employment information about you, including resumes, CVs, application forms, reference letters, information about former employment, education, qualifications and training courses.

1.3. Information Collected from Third Parties

Where necessary for certain roles, and to the extent permitted by law, Brambles may check the accuracy of personal information you provide during the recruitment process. We may also collect personal information about you from third parties, including referees.
In each case, Brambles will tell you in advance which part of your personal information will be verified and whether personal information will be collected from third parties, including an explanation of how this will be carried out and whether external agencies will be used.

Brambles will only collect specific and not general information.

If a third party source requires your consent before disclosing any personal information about you, Brambles will ask you to give your consent before contacting the third party.

You will be given the opportunity to explain any unexpected results which might affect your application.

Brambles will normally not approach your family and colleagues.

2. IP ADDRESSES AND COOKIES

2.1. IP Addresses

Our web servers may collect the name of the domain you used to access the Internet, the website you came from, and the website you visit next. This information is aggregated to measure the number of visits to the Portal, average time spent, page views, and other statistics about visitors to the Portal. We may also use this aggregated data to monitor site performance and to make the site both easier and more convenient to use.

When you visit our Portal, we collect certain technical and routing information about your computer to facilitate your use of the Portal. For example, we may log environmental variables, such as browser type, operating system and CPU speed, and the Internet Protocol ("IP") address of your originating Internet Service Provider, to try to bring you the best possible service. We may also record search requests and results to try to ensure the accuracy and efficiency of our search engine. We may use your IP address to track your use of the site. This "Click Stream" data may be matched with other information you provide.

2.2. About Cookies

Cookies are files, often including unique identifiers, that are sent by web servers to web browsers, and which may then be sent back to the server each time the browser requests a page from the server.

Cookies can be used by web servers to identity and track users as they navigate different pages on a website, and to identify users returning to a website. Cookies are either placed by our Website (first-party cookies) or other websites whose content appears on our Website (third-party cookies).

Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The Career Portal is hosted by our third party vendor, Smashfly Technologies Incorporated ("Smashfly). Please click here to review their Privacy Policy.

3. HOW WE USE PERSONAL INFORMATION

We may use personal information we obtain about you to:
3.1. Assess your suitability for the job opportunities to which you apply and, as the case may be, to make you a job offer
3.2. Consider you for job opportunities that match your qualifications (subject to your preferences collected at the time you submit a job application or elect to join our Talent Network)
3.3. Operate, evaluate and improve our Website
3.4. Ensure that the content from our Website is presented in the most effective manner for you and for your computer
3.5. Communicate with you about job opportunities we believe may be of interest to you, such as through email alerts and newsletters (subject to your preferences collected at the time you submit a job application or elected to join our Talent Network)
3.6. Gather your feedback about and improve our recruitment process
3.7. Analyze and enhance our recruitment communications
3.8. Protect against and prevent fraud, unauthorized transactions, claims, and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users
3.9. Comply with applicable legal requirements and industry standards and with our policies

4. DISCLOSURE OF PERSONAL INFORMATION

When you provide information through our Website, we may share that information as follows:

4.1. To facilitate the recruitment process, your information will be processed by members of our Global Recruitment Team, who are based in North America, EU/EEA, APAC, South Africa and Latin America. These individuals have received appropriate privacy training and understand their obligations regarding processing personal information.

4.2. For the purposes described in the "How We Use Personal Information" section of this Notice, we may share your personal information or usage information with third parties that perform functions on our behalf, such as companies or individuals that: host or operate our Website; analyze data; and provide recruitment process support.

4.3. We may share non-personal information, such as aggregate user statistics, demographic information, and usage information with third parties.

4.4. We may disclose your personal information, usage information, and other information about you to parties acquiring part or all of our assets, as well as to attorneys and consultants. If we transfer your information to an acquirer, we will use reasonable efforts to direct the acquirer to use your information in a manner that is consistent with this Notice.

4.5. If any bankruptcy or reorganization proceeding is brought by or against us, your information may be considered a company asset that may be sold or transferred to third parties.

4.6. We may disclose information about you to others if we have a good faith belief that we are required to do so by law or legal process, to respond to claims, or to protect the rights, property or safety of Brambles or others.

5. SPECIAL PROVISIONS FOR OUR EUROPEAN USERS
By applying for a job opportunity with us and/or by joining our Talent Network, you understand and acknowledge that we may collect, use and disclose personal information in connection with our recruitment process and may provide such information (consistent with the terms of this Notice) within Brambles - any or all of which may be outside your resident jurisdiction. Such processing will occur only where appropriate safeguards are in place, including but not limited to contractual clauses pursuant to the European Commission’s decision (C(2010)593) of 5 February 2010 on Standard Contractual Clauses for the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection (“Model Clauses”).

5.1. Where we store your personal information

Please be aware that the personal information you share will be stored outside of the EU/EEA, and in a database and on servers in the United States and other countries in which the privacy laws may not be as comprehensive as those in your country of residence or citizenship.

For instance, our applicant tracking system is designed and supported by PeopleFluent, Inc. and the personal information you provide when applying to a particular job will be stored on its servers located in the United States.

Similarly, our Talent Network is designed and supported by Smashfly. If you elect to join our Talent Network your contact information, areas of interest, city, state, country, and whether you are open to relocation, will be stored on Smashfly servers located in the United States.

Both of these third party vendors are located in the United States, store personal information on servers in the United States, and provide system support from the United States. Accordingly, both Peoplefluent and Smashfly have entered into Data Processing Addendums with us that are GDPR compliant and include Model Clauses.

5.2. Legal Basis for Processing

We will only collect and process personal data about you where we have a legal basis including:

- **Performance of a contract**- we process your personal information based on performance of contract when you apply for a particular job opportunity
- **Consent**- we process your personal information based on consent when you join our Talent Network or request that we consider you for other job opportunities
- **Legitimate interests**- we process your personal data based on legitimate interests in order to protect you, us or others from security threats and manage our recruitment process

We may process your personal data for the purposes of our legitimate interests, provided that such processing does not outweigh your rights and freedoms. Where we rely on legitimate interests, you have the right to object. Please keep in mind that if you object this may affect our ability to perform certain services for your benefit.

5.3. European Supervisory Authority

You have the right to register a complaint with a European data protection or supervisory authority about our collection and use of your personal information. For more information, please contact your...

6. PERSONAL INFORMATION ACCESS REQUESTS

You may: (i) request information on and access to the personal information we hold about you; (ii) request that any inaccurate personal information we hold be corrected; (iii) object to certain types of processing of your personal information we carry out (including the right to opt-out of email alerts for job opportunities); (iv) request that we delete the personal information we hold about you; and (v) request a copy of your personal information in a machine readable, commonly used format (or to request we transfer your personal information in such a format to a third party service provider).

Whilst some of these rights can be exercised by you directly through the Website, other rights, such as those relating to requests to delete your personal data, will need to be submitted to us at careers@brambles.com.

We will consider such requests and respond to you. If we deny an access request, we will notify you of the reasons for the denial.

7. DATA RETENTION

If you are not the successful candidate for a job opportunity to which you applied, we will securely store your information and will destroy your information after the lesser of two years or the maximum period in which a legal claim about the recruitment process may be brought against us.

We will not retain your Employment Information to consider in relation to job opportunities to which you have not applied unless you have been asked for, and have given, your consent (e.g., by joining our Talent Network).

8. SECURITY

We maintain certain administrative, technical and physical safeguards to help protect against loss, misuse or unauthorized access, disclosure, alteration, or destruction of your personal information. However, no electronic data transmission or storage of information can be completely secure. We cannot ensure or warrant the security of any information you transmit to us or that we acquire. Accordingly, you must use our Website at your own risk.

If, despite all our efforts, a data breach does occur, we shall do everything reasonably practicable to limit the damage. In case of a data breach, and depending on the circumstances, we will inform you about remedial actions to prevent any further damage.

9. HOW TO CONTACT US

If you have any questions, comments or concerns about this Notice, please contact our Chief Privacy Officer at privacy@brambles.com. Alternatively, please contact our location nearest you. Our list of business locations is available here.

10. PRIVACY NOTICE UPDATES
We reserve the right to modify or supplement this Privacy Notice at any time. Changes to the policy will be posted at least 30 days prior to the effective date of the changes. The date below indicates when this Privacy Notice was last changed.

This Notice was last updated on November 2, 2018, effective November 2, 2018.