

DATA PRIVACY STATEMENT: FOR CANDIDATES

1. INTRODUCTION

- 1.1 The ATP Tour, Inc and its group companies (“we”, “our” or “us”) provide this Data Privacy Statement to make applicants for jobs with us aware of our policy relating to the processing of personal information.
- 1.2 This policy sets out the basis on which we will process your personal information. Please read the policy carefully to understand our practices regarding your personal information and how we will use it.

2. ABOUT US

- 2.1 We are registered with the Information Commissioner’s Office (“ICO”) under registration number FC027122

Contacting us:

If you have any questions about this data privacy statement or your Information, or to exercise any of your rights as described in this policy or under applicable data protection laws, you can contact Murray Swartzberg who is our designated Data Protection Officer:

By email: mswartzberg@atpworldtour.com

By telephone: + 1 (904) 273-7554

3. WHAT INFORMATION WE COLLECT

- 3.1 We ask for personal information from job applicants to assist with our recruitment processes and to monitor recruitment statistics.
- 3.2 Information that we may collect includes, but is not limited to, the following:
 - your name;
 - home address;
 - contact details (such as telephone number and email address);
 - date of birth;
 - gender;
 - marital status;
 - copies of passport, driving licence and similar documents;
 - education history, training and professional experience;
 - current and past employment details;
 - immigration status and work permits;
 - languages spoken and level of proficiency;
 - other information given in your CV.
- 3.3 Some of this information, and additional information, may be provided to us by recruitment agencies with whom you have registered an interest. Such recruitment agencies support our recruitment processes under a duty of confidentiality.
- 3.4 We may also receive other information about you from organisations such as credit reference agencies, fraud prevention agencies and referees.

3.5 During the recruitment process we may also research information regarding your skills, experience or qualifications and comments and opinions made public on social networking sites such as LinkedIn, Facebook and Twitter.

4. SPECIAL CATEGORIES OF (SENSITIVE) PERSONAL DATA

4.1 You may also supply us with sensitive personal data relating to your racial or ethnic origin, religious or similar beliefs, data concerning your health or data concerning your sex life or sexual orientation.

4.2 We will use this information for the purposes of carrying out our obligations as an employer including monitoring of equality of opportunity, to assess suitability for particular jobs and to consider whether adjustments may need to be made to accommodate an applicant with a disability.

5. WHAT WE DO WITH YOUR INFORMATION

5.1 Any information about you which is obtained by us during the application process (whether obtained directly from you or from third parties such as your referees) may be used by us for the following purposes:

- to consider your suitability for employment;
- to take up your references;
- to conduct appropriate checks;
- for compliance with our legal obligations; and
- to negotiate and communicate with you in relation to your application.

5.2 Your information will not be used for other purposes without your permission, save as required by applicable law.

6. THE LEGAL BASIS FOR OUR PROCESSING

6.1 The legal basis for our processing of your personal information is based on the fact that you have applied to us for a position and it is necessary for us to process your information in order to consider your application in line with our legitimate recruitment purposes.

6.2 The legal basis for our processing of any special categories of (sensitive) personal data is for the purposes of carrying out our obligations as an employer.

7. SHARING YOUR INFORMATION WITH THIRD PARTIES

7.1 For the purposes set out in “What we do with your information” above, your information may be shared with our authorised staff.

7.2 We may disclose your information to our group companies and to departments other than the one to which you may have originally applied to work if we think it is appropriate to do so for the above purposes.

7.3 We may also disclose your personal information to third parties where there is a legitimate reason to do so including for the following reasons:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if all or substantially all of our assets are acquired by a third party, in which case personal information held by it about its employees will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

8. SECURITY OF YOUR INFORMATION

8.1 We store your information in hard copy and in electronic format. We use industry standard physical and procedural security measures to protect information. Hard copy information files are restricted to authorised individuals. We use, as appropriate, encryption, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

8.2 Where appropriate, we use pseudonymisation and / or encryption to protect your information.

9. INTERNATIONAL TRANSFERS

9.1 As an international organisation, authorised personnel may access your information in any country in which we operate. Therefore, it may be necessary to transfer your details to members of our group located in countries that may not offer equivalent data protection or privacy laws to those in the UK or the EU.

9.2 Regardless of where your information is transferred, we shall ensure that your information is safe and shall take all steps reasonably necessary to put in place appropriate safeguards to ensure that your information is treated securely and in accordance with this policy and applicable law. Details regarding these safeguards can be obtained from our Data Protection Officer whose details are given in "Contacting us" above.

10. HOW LONG WE KEEP YOUR INFORMATION

10.1 If your application is successful, and you subsequently become employed by us, the information will become part of your personnel file. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment and in accordance with our Employee Privacy Notice, a copy of which will be provided or made available to you.

10.2 Once your employment with us has ended, we will retain the file in accordance with our data retention policy and then delete it.

10.3 Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed. It will then be destroyed or deleted. We may retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

11. YOUR RIGHTS

11.1 Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

11.2 Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

12. EXERCISING YOUR RIGHTS

12.1 You can exercise any of your rights as described in this policy and under data protection laws by contacting us as given in “Contacting us” above.

12.2 Save as described in this policy or provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

12.3 Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

13. COMMUNICATION

13.1 Whilst processing your application we may contact you by email.

14. COMPLAINTS

14.1 You have the right to complain to the Information Commissioner’s Office (<https://ico.org.uk/>) about our data processing activities in relation to your personal information if you think they infringe applicable data protection laws (ICO helpline on 0303 123 1113).

15. UPDATES TO THIS POLICY

15.1 We may amend this policy at any time and will place notice of any such amendments on [our website].