

# Recruitment Privacy Notice

## Fraud Alert

Communications relating to your candidacy will come either from The Brattle Group via a brattle.com email address or from our recruitment system, Greenhouse Software, Inc., via a greenhouse.io email address. Please do not respond to communications from any other email domains (e.g. Gmail.com, yahoo.com) even if they appear to be related to your candidacy.

## United States

The protection and security of your personal data are important to us. Therefore, any personal data collected, processed or used by us will be with your knowledge and/or consent.

By registering at this site, you are authorizing The Brattle Group ("the firm"), to collect your personal information relevant to employment with the firm, and hold it in a database physically located in in the U.S. controlled by the firm. Except as noted herein, your personal information will only be accessed by employees or agents of the firm, whose job function involves hiring employees or human resources. As a result of your registration, you may be contacted in the future with details on other positions that match your expressed skills and background and to update your information.

You hereby acknowledge and agree that your personal information may be transferred for processing outside of your country including to third countries that do not have equivalent data protection or data privacy laws as your country and that may have been deemed to have inadequate data privacy laws under the EU Data Privacy Directive. The firm may also disclose your personal information if required to do so by law or a regulatory organization, or, on a confidential basis, to relevant third parties such as site technicians, auditors, lawyers, or other professional advisors. The ways in which The Brattle Group collects and uses personal data, including your rights of access to and correction of your personal data, are regulated by the firm's Written Information Security Program (WISP) policy. A copy of this policy can be made available upon request by emailing [Recruiting@brattle.com](mailto:Recruiting@brattle.com).

Your personal information will be retained by the firm for a reasonable period and/or as otherwise required by applicable legal standards. If you are hired as an employee of the firm, this information may be transferred into an employee record and may be used and shared with

other employees and agents of the firm, and as part of our marketing activities. If The Brattle Group does not employ you, we may nevertheless retain and use this information so as to be able to consider your qualifications later if a suitable position becomes available and, if appropriate, refer back to this if you submit a resume or other information to The Brattle Group again in the future, as well as for more general management and research purposes.

The site does not provide binding offers, or terms or conditions of employment. Any employment offer that may result from your identifying a potential opportunity and/or submitting information in response thereto is in accordance with the specific terms of that offer and not based in any way on the description of the opportunity on the site. Employment at the firm within the United States and where permitted under applicable law is "At Will," for an indefinite and unspecified duration: If you are hired, you may resign your employment at any time, and the firm may terminate your employment at any time, without notice, and for any reason not prohibited by law. There are no exceptions to this "At Will" policy, unless they are agreed to in writing by an authorized officer of the firm.

By submitting your information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any relevant information of an adverse nature. You understand that any inaccurate information may make you ineligible for employment or, if hired, subject to dismissal.

By submitting your information, you acknowledge that you have read and understood the foregoing and consent to the uses of your information as set out above.

## **Australia and Canada**

The protection and security of your personal data are important to us. Therefore, any personal data collected, processed or used by us will be with your knowledge and/or consent.

By registering at this site, you are authorizing The Brattle Group ("the firm"), to collect your personal information relevant to employment with the firm, and hold it in a database physically located in in the U.S. controlled by the firm. Except as noted herein, your personal information will only be accessed by employees or agents of the firm, whose job function involves hiring employees or human resources. As a result of your registration, you may be contacted in the future with details on other positions that match your expressed skills and background and to update your information.

You hereby acknowledge and agree that your personal information may be transferred for processing outside of your country including to third countries that do not have equivalent data protection or data privacy laws as your country and that may have been deemed to have inadequate data privacy laws under the Personal Information Protection and Electronic Documents Act. The firm may also disclose your personal information if required to do so by law or a regulatory organization, or, on a confidential basis, to relevant third parties such as site technicians, auditors, lawyers, or other professional advisors. The ways in which The Brattle Group collects and uses personal data, including your rights of access to and correction of your personal data, are regulated by the firm's Written Information Security Program (WISP) policy. A copy of this policy can be made available upon request by emailing [Recruiting@brattle.com](mailto:Recruiting@brattle.com).

Your personal information will be retained by the firm for a reasonable period and/or as otherwise required by applicable legal standards. If you are hired as an employee of the firm, this information may be transferred into an employee record and may be used and shared with other employees and agents of the firm, and as part of our marketing activities. If The Brattle Group does not employ you, we may nevertheless retain and use this information so as to be able to consider your qualifications later if a suitable position becomes available and, if appropriate, refer back to this if you submit a resume or other information to The Brattle Group again in the future, as well as for more general management and research purposes. The firm will return or destroy personal information at the request of the applicant subject to the firm's compliance with its WISP and other retention obligations. Such requests may be made by emailing [Recruiting@brattle.com](mailto:Recruiting@brattle.com).

The site does not provide binding offers, or terms or conditions of employment. Any employment offer that may result from your identifying a potential opportunity and/or submitting information in response thereto is in accordance with the specific terms of that offer and not based in any way on the description of the opportunity on the site. Employment will be conditional upon the execution of an employment contract. By submitting your information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any relevant information of an adverse nature. You understand that any inaccurate information may make you ineligible for employment or, if hired, subject to dismissal.

By submitting your information, you acknowledge that you have read and understood the foregoing and consent to the uses of your information as set out above.

## Europe

The Brattle Group (the “firm”) is committed to safeguarding the privacy of its candidates. Please read the European Candidate Privacy Notice, which is intended to clarify how we collect, use, and disclose information that candidates share with us during and after the recruitment process, as well as to ensure that candidates appreciate what information we collect with their permission, and what their rights are in respect of that information.

The site does not provide binding offers or terms and conditions of employment. Any employment offer that may result from your identifying a potential opportunity and/or submitting information in response thereto is in accordance with the specific terms of that offer and not based in any way on the description of the opportunity on the site.

By submitting your information, you confirm that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any relevant information of an adverse nature. You understand that any inaccurate information may make you ineligible for employment or, if hired, subject to dismissal.

By submitting your information, you also acknowledge that you have read and understood the foregoing, including the European Candidate Privacy Notice.

# EUROPEAN CANDIDATE PRIVACY NOTICE

## 1. Introduction

The Brattle Group Limited (“Brattle” “we” or “us”) is committed to protecting the personal data of its job applicants. This Notice provides important information about how Brattle collects, uses and stores your personal data to facilitate the application and recruitment process.

You should read this Notice carefully and raise any questions you may have with your local HR team.

## 2. Scope

This Notice applies to all candidates applying for roles in any of our European offices.

## 3. What information do we collect?

As your prospective employer, Brattle will collect, use and store your personal data in connection with the application and recruitment process. Personal data means information which identifies you and relates to you as an individual. The main categories of candidate information which we may process in connection with our recruiting activities include:

- personal contact information (including your name, title, home address, personal telephone number(s) and personal e-mail address)
- work history and other relevant experience including information contained in CV, cover letter or job application form
- education information including degrees awarded, transcripts and other information provided in support of the job application
- compensation history
- information collected during phone screenings and interviews
- details regarding the type of employment sought, desired salary, willingness to relocate, job preferences, and other information related to compensation and benefits
- reference information
- information related to previous applications to us or previous employment history with us

- documents evidencing your right to work (e.g. copy passport) (including information about your immigration status where relevant)
- date of birth
- gender
- information gathered through the Company/Group's monitoring of its IT systems, building access records and CCTV recording in relation to your communications with us and attendance at our premises

This list is not exhaustive, and there may be other personal data which we collect, store and use in the context of the application and recruitment process.

Brattle collects this information in a variety of ways. The majority of the personal data which we process will be collected directly from you. For example, personal data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment. However, we may also collect personal data about you from third parties, such as recruitment agencies, official bodies such as degree granting institutions and, as further explained below, references supplied by former employers.

You are under no statutory or contractual obligation to provide personal data to Brattle during and after the recruitment process. However, failure to provide such data when requested may affect our ability to accomplish the purposes stated in this Notice, including considering your suitability for employment and/or entering into an employment contract with you. We will notify you if this is the case.

#### **4. References and vetting**

As part of our referencing and vetting procedures, we may contact certain third parties in order to verify information (including personal data) provided by you as part of your application.

These third parties may include:

- former employers in order to verify your previous employment history
- universities and/or other establishments for higher education that you attended in order to verify your education history

We will only seek this information in relation to successful candidates that have accepted a conditional offer of employment with us and we will specifically inform such candidates that we will be contacting these third parties in advance of doing so.

## **5. How do we use personal data?**

Brattle has a legitimate interest in processing personal data during the application and recruitment process and in keeping records of that process. Processing candidate personal data allows us to manage the recruitment process, as well as to assess and confirm a candidate's suitability for employment. For example, we process candidate personal data in order to:

- to identify and evaluate job applicants, including assessing skills, qualifications and experience
- verifying candidate information and carrying out employment, and reference checks, where applicable and in order to prevent fraud
- communicating with you about the recruitment process and your application
- to comply with our legal, regulatory, or other corporate governance requirements

In addition to using your personal data to consider you for the role you applied for, we will retain and process your personal data as further detailed below, including for purposes of considering you for other roles that may be appropriate for you. If you do not want us to consider you for other roles please contact [Recruiting@brattle.com](mailto:Recruiting@brattle.com).

## **6. What special categories of personal data do we process?**

Certain categories of data, such as data relating to health, race, ethnic origin, religion and sexual orientation are considered "special categories of personal data" under applicable legislation, and are subject to additional safeguards. If we receive and/or process any "special categories of personal data" about you during the recruitment process we will only share such data internally and with third party vendors, where we have a specific and legitimate reason for so doing.

Brattle is committed to providing equal opportunities for employment and progression to all of its employees and from time to time it may process information relating to ethnic origin, race, nationality, sexual orientation and disability, alongside information relating to gender and age.

## 7. Legal bases of the processing

We rely on the following legal grounds for the collection, processing, and use of candidates' personal data:

- Where applicable, it is necessary for the performance of a contract with you (your employment contract or equivalent) or in order to take steps at your request prior to entering into such a contract;
- Compliance with legal obligations, in particular in the area of labour and employment law, social security and protection law, data protection law, tax law, and corporate compliance laws;
- Your prior consent, where applicable;
- Establishing, exercising, or defending legal claims or as required whenever courts are acting in their judicial capacity; and
- Performance of a task carried out in the public interest or in the exercise of official authority vested in Brattle.

We rely on the following legal grounds for the collection, processing, and use of "special categories of personal data":

- Carrying out the obligations and exercising the specific rights of Brattle or you in the field of employment and social security and social protection law as permitted by EU or local law or by a collective agreement;
- Establishing, exercising, or defending legal claims or as required whenever courts are acting in their judicial capacity; and
- For assessment of the working capacity of the employee, as permitted by local data protection law.

## 8. Security measures

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure.



## **9. When and with whom do we share candidate personal data?**

Brattle will share employee personal data with third parties to facilitate the application and recruitment process, to enter into an employment contract with you or where necessary to comply with our legal obligations.

In all cases, we share such data pursuant to written agreements, which include appropriate security measures, and limit any such third parties' use of the data to the purposes which we have identified, and not for their own purposes, and they are not permitted to further share the data without our express permission.

Additionally, The Brattle Group, Inc. is responsible for certain accounting and administrative functions for the entire firm. The Brattle Group, Inc. is incorporated under Massachusetts Law with its principal place of business based in Boston, Massachusetts. It is therefore necessary to transmit outside of the European Union and to otherwise process certain of your personal data outside of the European Union to properly perform administrative functions associated with the application and recruitment process. Some of your personal information may also be stored in our secure company servers located in Australia and Canada.

If you have any questions about the transfer of your personal data in these circumstances, please contact [Recruiting@brattle.com](mailto:Recruiting@brattle.com).

## **10. How long will my personal data be retained?**

Brattle's policy is to retain personal data only for as long as needed to fulfil the purpose(s) for which it was collected, or otherwise as required under applicable laws and regulations. For candidates, we may retain your personal data for a period of 5-7 years after the application date.

Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you. If you do not wish for your personal data to be maintained on file for this purpose, please inform us by writing to [Recruiting@brattle.com](mailto:Recruiting@brattle.com).

If your you are offered and accept employment with us, the personal data we collected during the application and recruitment process will become part of your employment record and we may use it in connection with your employment in accordance with our internal privacy practices and policies.

## 11. Updates to this notice

We may update this Notice from time to time to reflect any material changes in applicable law and/or the categories of personal data which we process.

## 12. What are my rights in relation to my personal data?

The Brattle Group will always seek to process your personal data in accordance with its obligations and your rights.

You will not be subject to hiring decisions based solely on automated data processing without your prior consent.

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data. You also have the right to request the transfer of your personal data to another party in a commonly used format. If you have any questions about these rights, please contact [Recruiting@brattle.com](mailto:Recruiting@brattle.com).

You have a separate right of access to your personal data processed by The Brattle Group. You may be asked for information to confirm your identity and/or to assist The Brattle Group to locate the data you are seeking as part of our response to your request. If you wish to exercise your right of access you should set out your request in writing to your local HR Contact.

Finally, you have the right to raise any concerns about how your personal data is being processed with the appropriate supervisory authority (e.g. the Information Commissioner's Office (ICO) by going to the ICO's website: <https://ico.org.uk/concerns/> or contacting the ICO on 0303 123 1113 or [casework@ico.org](mailto:casework@ico.org); Agencia Española de Protección de Datos (AEPD) by going to AEPD's website: <https://www.aepd.es/agencia/contacto.html>; or The Italian Data Protection Authority (Garante per la protezione dei dati personali) by going to its website: [http://www.garanteprivacy.it/home\\_en](http://www.garanteprivacy.it/home_en)).