1. Introduction
- This North America (NA) Recruitment Privacy Notice explains how we collect, use, and protect your Personal Data during the Recruitment process.
- Your privacy is important to us, and we are committed to protecting and safeguarding your rights in relation to your Personal Data.
- For the purposes of applicable data protection legislation (NA Privacy Laws), the company responsible for your Personal Data ("Invesco", "we", or "us") is shown in Annex 1.
- This NA Recruitment Privacy Notice is non-contractual, and we may amend it from time to time. Please visit this page regularly to view any changes to this NA Recruitment Privacy Notice.
- This NA Recruitment Privacy Notice applies in the relevant countries where we operate in NA. Invesco respects the local privacy and data protection laws and regulations and, where relevant, key additional country-specific obligations are included in Annex 2.

2. What kind of Personal Data do we collect about you?
We collect information about you to enable the Recruitment process to run smoothly. Depending on the relevant circumstances and subject to local laws and requirements, we may collect information about you as shown in the table below. Please note the following: (i) the Categories of Personal Data below is a comprehensive list of the categories of Personal Data we collect during the overall process. We do not collect all the Categories of Personal Data at once, but we collect specific categories based on which step we are on in the process; (ii) the Personal Data in *italics* is only collected in limited circumstances where collection of this information is applicable/appropriate:

<table>
<thead>
<tr>
<th>Categories of Personal Data</th>
<th>Examples (Personal Data in <em>italics</em> is only collected in limited circumstances)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Your personal details</td>
<td>Name; age/date of birth; sex/gender; your signature, including in electronic form; immigration status (whether you need a work permit); nationality/citizenship/place of birth; <em>health and disability-related information</em></td>
</tr>
<tr>
<td>Your private contact details</td>
<td>Address; email address; and telephone number</td>
</tr>
<tr>
<td>Identification data</td>
<td>A copy of your driving license and/or passport/identity card; social security number (or equivalent in your country) and any other tax-related information; <em>biometric information</em>; information we obtain from background verification checks, <em>including information relating to criminal convictions and offenses</em></td>
</tr>
<tr>
<td>Your education and employment history</td>
<td>Exam results, employment history and locations of previous employment; details about your current or former role(s)</td>
</tr>
<tr>
<td>Automatically collected Personal Data</td>
<td>CCTV footage (in locations where applicable); communications that you send to Invesco which pass through Invesco Systems, including emails and social media messages</td>
</tr>
<tr>
<td>Other</td>
<td><em>Extra information that you or third parties such as your references choose to provide to us (including Sensitive Personal Data)</em></td>
</tr>
</tbody>
</table>

3. How do we collect your Personal Data?
We collect your Personal Data in three primary ways:

1) Personal Data you give to us.
   There are numerous ways that you can share your information with us. These may include:
   - When you make a job application to Invesco via our website or other recruitment portal;
   - When you register to receive more information from us at a job fair or other Invesco careers event; or
   - Information you provide to Invesco's Staff in communications during the Recruitment process.
2) Personal Data we receive from other sources;
We also receive Personal Data about you from other sources, such as:
- LinkedIn and other job sites or from third parties such as recruitment agencies, consultants, and members of Invesco’s Staff who refer you to us;
- Our internal recruitment team who receive your information;
- Third party service providers who undertake background checks about you on our behalf;
- Your references; and
- Twitter or similar social media sites on which you ‘follow’ us.

3) Personal Data we collect automatically;
We may collect your Personal Data automatically such as:
- Communications that you send to Invesco which pass through Invesco Systems, including emails and social media messages;
- When you visit our website, your IP address, the date and the times and frequency with which you access the website, and the way you browse its content. We will also collect data from you when you contact us via the website; and
- Via cookies when you visit our website, in line with cookie settings in your browser. We may use data from your use of our websites to enhance other aspects of our communications with you.

4. How will we use your Personal Data and what is our basis for doing so?
This section of this NA Recruitment Privacy Notice provides a non-exhaustive list of purposes that we may use your Personal Data for and the bases on which we rely to ensure that we process your Personal Data lawfully. We only use your sensitive information to perform the services you reasonably expect as a job applicant, such as maintaining accounts, providing customer service, and other similar services on behalf of the business.

<table>
<thead>
<tr>
<th>Purposes of the processing</th>
<th>Basis for the processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensuring the smooth running of the Recruitment process and enabling us to make a decision about your suitability for the role:</td>
<td>Processing is necessary to pursue our interest in hiring appropriate Staff, where this interest does not override your interests or rights or freedoms;</td>
</tr>
<tr>
<td>• Enabling recruiters to contact you about the role; collecting your data from you and other sources;</td>
<td>Processing is necessary for the performance of our intended contract with you (where relevant);</td>
</tr>
<tr>
<td>• Storing and transferring your details (and updating them when necessary) on and between our internal recruitment databases and applicant tracking systems, and keeping a record of when you attend an interview or other assessment;</td>
<td>Processing relates to Personal Data which is manifestly made public by you (e.g. on your publicly accessible social media profile);</td>
</tr>
<tr>
<td>• Assessing your qualifications for a particular role, including decisions about appointment; enabling our hiring managers to decide whether to make you a job offer;</td>
<td>Processing is necessary to comply with our legal obligations (e.g. where permitted under local law we may be required to keep a record of your application in order to comply with local immigration laws);</td>
</tr>
<tr>
<td>• Verifying information we have received, using third party resources where permitted under local law (such as psychometric evaluations or skills tests) or through information requests (such as references, background verification checks, qualifications, and criminal convictions checks, to the extent that this is appropriate);</td>
<td>Processing Personal Data is necessary for the purposes of carrying out our obligations in the field of employment law;</td>
</tr>
<tr>
<td>• Informing you of the result of your application, determining the terms on which you will work for us, and making arrangements in order to offer you a job;</td>
<td>Processing is based on your consent (e.g. when we wish to carry out background verification and criminal records checks that are not required by law);</td>
</tr>
<tr>
<td>• If you are successful in being appointed to a role, transferring your Personal Data onto our internal HR systems</td>
<td></td>
</tr>
</tbody>
</table>
Keeping Invesco secure (where and subject to the extent permitted by local law):
- Intercepting and monitoring electronic communications that you send to Invesco which pass through Invesco Systems, including emails and social media messages, to ensure network and information security;
- Running CCTV at our premises to ensure your safety and security, and that of our Staff and property
- Processing is necessary to pursue our interest in protecting our Staff and property, where this interest does not override your interests or rights or freedoms

Making appropriate adjustments for you:
- If you suffer from any health conditions or disabilities, we may record those details so that we can make reasonable adjustments for interviews and other Recruitment procedures if required
- Processing is necessary to comply with our legal obligations;
- Processing certain Personal Data is necessary for the purposes of carrying out our obligations in the field of employment law;
- Processing certain Personal Data is necessary to assess your working capacity

To establish, exercise and defend legal claims:
- In certain circumstances, we may use your Personal Data to help us establish, exercise or defend legal claims
- Processing is necessary to pursue our interest in establishing, exercising or defending a legal claim, where this interest does not override your interests or rights or freedoms;
- Processing your Personal Data is necessary to help us to establish, exercise or defend legal claims

Retaining your personal data for future roles:
- If you are unsuccessful in your application for a role with Invesco, we may retain your application in the event that a suitable role at Invesco
- Processing is necessary to pursue our interest in hiring appropriate Staff, where this interest does not override your interests or rights or freedoms
- Processing is based on your consent

5. Who do we share your Personal Data with?
We may share your Personal Data with the following recipients:
- Any of our group companies (this may include those in our overseas offices), for example, for internal administrative, regulatory compliance, and other legitimate business purposes;
- Your family and personal representatives, for example, if you are involved in an accident whilst at an interview with Invesco;
- Individuals and organizations who hold information related to your reference or application to work with us, such as current or past employers, educators and examining bodies, immigration agencies, employment and recruitment agencies, and criminal convictions checks providers;
- Third parties who hold information related to your financial record, such as financial organizations, credit reference agencies, and debt collection and tracing agencies;
- Where appropriate, medical professionals such as your general practitioner or an occupational health specialist;
- Third party service providers who perform functions on our behalf (including external consultants, business associates, and professional advisers such as lawyers, auditors, accountants, technical support functions and psychometric testing providers);
- Pension scheme administrators, external consultants, business associates and professional advisers such as lawyers, auditors, accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems); and
- Third party outsourced IT and document storage providers where we have appropriate protections in place.

6. How do we store and transfer your Personal Data internationally?
Invesco is a global employer. In order for us to continue operating in this way and to carry out the purposes described in this NA Recruitment Privacy Notice, your Personal Data may be transferred to recipients (set out in the section on “Who do we share your personal data with?”) which may be located outside of your jurisdiction. We endeavour to put standard data protection clauses in place and where
we use third parties, we may rely on other appropriate transfer mechanisms they have implemented (e.g. Binding Corporate Rules) to provide appropriate safeguards to ensure that your Personal Data will remain adequately protected in accordance with applicable data protection laws.

7. How do we protect your Personal Data?
To protect the security of your Personal Data, we implement appropriate technical and organisational security measures which include physical and technical security safeguards and a governance model that ensures that adequate policies, procedures and controls are in place within our organisations. If you suspect any misuse or loss of or unauthorised access to your Personal Data, please let us know immediately. Details of how to contact us can be found in Annex 1.

8. How long do we hold your Personal Data?
- Subject to your rights (as explained in this NA Recruitment Privacy Notice), we will ordinarily process your data from when you first contact us and retain it for a period until after the Recruitment process ends for the period permitted under local law. The precise length of time will depend on the type of data, our legitimate business needs, and other legal or regulatory rules that may require us to retain it for certain minimum periods. For example, we may be required to retain it for a certain period to comply with local legal requirements in relation to immigration checks.

9. What are your rights in relation to the Personal Data we hold about you?
Your rights with relation to Personal Data vary by jurisdiction in North America. For California residents and citizens, according to the California Consumer Privacy Act (CCPA), you may have the right, subject to the conditions specified in applicable law, to request us to:
- disclose to you the categories and specific pieces of personal information we have collected, the categories of sources from which your information was collected, the business or commercial purpose for collecting your personal information, and the categories of third parties with whom we shared your personal information;
- delete your personal information (unless it is necessary for us to retain your personal information for legitimate business purposes as specified by law);
- correct your personal information; and
- limit the use and disclosure of sensitive personal information.

If you make a request related to personal information about you, you may be required to supply a valid means of identification as a security precaution. We will process your request within the time provided by applicable law.

If you have a question about or wish to exercise your rights, you can contact us as set out in Annex 1 below.

If you wish to exercise your rights, we will need to verify your identity. To do so, we may request that you match specific pieces of information you have provided us previously, as well as, in some instances, provide a signed declaration under penalty of perjury that you are the individual whose personal information is the subject of the request. If it is necessary to collect additional information from you, we will use the information only for verification purposes and will delete it as soon as practicable after complying with the request. For requests related to particularly sensitive personal information, we may require additional proof of identification. If you make a request through an authorized agent, we will require written proof that the agent is authorized to act on your behalf.

We do not discriminate against you for exercising any of these rights.

For Canadian residents and citizens, PIPEDA gives you the following rights:
- Right to consent and to withdraw consent – Your consent is required for us to use to collect, use, and/or disclose your Personal Data. You can withdraw consent at any time.
- Right to accuracy - You have the right to expect the Personal Data we hold about you to be accurate, complete, and up-to-date.
- Right to access – You have the right to request the Personal Data we hold about you and request a change if it is inaccurate.
- Right to protection – Your Personal Data shall only be used for the purposes for which it was collected, and we are required to protect your Personal Data against improper use.
- Right to challenge compliance – You have the right to challenge our compliance with our obligations under PIPEDA.

Please note that these rights are limited and, where legally permitted to do so, we may rely on these
limitations when responding to your data requests.

If you would like to obtain more information about or exercise any of these rights, details of how to contact us can be found in Annex 1. We will seek to respond to your request without undue delay, (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues you raise.

### 1. How can you contact us?
Please contact us using the details in Annex 1

#### Annex 1 – How can you contact us?

<table>
<thead>
<tr>
<th>Country in which you sought employment at Invesco</th>
<th>The Invesco entity responsible for processing your Personal Data will be the one where you sought employment, or the counterparty associated with the relevant arrangement with you (e.g. if you are a contractor)</th>
</tr>
</thead>
<tbody>
<tr>
<td>HR United States:</td>
<td><a href="mailto:invescocareers@invesco.com">invescocareers@invesco.com</a></td>
</tr>
<tr>
<td>HR Canada:</td>
<td><a href="mailto:invescocareers@invesco.com">invescocareers@invesco.com</a></td>
</tr>
<tr>
<td>Privacy:</td>
<td><a href="mailto:na.privacy@invesco.com">na.privacy@invesco.com</a></td>
</tr>
</tbody>
</table>

How you can get in touch with us:
- to exercise your rights in relation to your Personal Data;
- if you suspect any misuse or loss of or unauthorised access to your personal information;
- with any questions, comments or concerns about this NA Recruitment Privacy Notice.

#### Annex 2 – Country Specific Variations to our NA Recruitment Privacy Notice

- United States
- Canada

#### Annex 3 – Glossary

<table>
<thead>
<tr>
<th>NA</th>
<th>Canada, the Cayman Islands, and the United States.</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA Privacy Laws</td>
<td>Laws and regulations from the United States and Canada dealing with processing of personal data, personal healthcare information, and financial information of individuals, which can be collected by governments, public or private organisations, or other individuals. These laws and regulations include: Gramm-Leach-Bliley Act (GLBA), California Consumer Privacy Act (CCPA), Personal Information Protection and Electronic Documents Act (PIPEDA), etc.</td>
</tr>
</tbody>
</table>
**Invesco Systems**

Invesco Systems include, but are not limited to:

- Technology systems that are owned and managed by Invesco, including those providing access to Invesco systems, internet or third-party technology systems, such as desktops, mobile computing devices (e.g. laptop / smartphone / tablet / USB drive), telephones, voicemail, fax machines, cameras, network communication hardware used for Invesco business and other technology.
- All Invesco owned, licensed, and/or provided software;
- Any Invesco owned systems/software accessed using personally owned devices or accessed through company provided hardware, including computer programs, business applications, bulletin boards, the Internet, company intranet; and
- All company owned electronic data or files, including individual computer files, electronic documents, application data, electronic mail/messaging and records of computer, internet, or company intranet use.

**Personal Data**

This means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, and we also refer to Personal Data as "personal information", "your information" and "information about you";

**Recruitment**

This refers to individuals who are seeking employment as members of Invesco's Staff.

**Sensitive Personal Data**

This is Personal Data consisting of information such as your racial or ethnic origin, your political opinions or religious beliefs, whether you are a trade union member, your physical and mental health, your genetic and biometric data, data relating to your sex life and sexual orientation, and whether you have or are alleged to have committed a criminal offence. Due to the nature of Sensitive Personal Data, data protection legislation is much stricter about how such data should be held and processed.

**Staff**

Includes current and former employees and interns engaged (or who have accepted an offer to be engaged) directly in the business of Invesco, as well as certain other workers, consultants and contractors who are, or were, engaged in the business of providing services to Invesco (even though they are not classed as employees). For illustrative purposes, it is generally the case that if an individual is granted access to the Invesco Systems, they will be covered by the terms of this NA Recruitment Privacy Notice.