Introduction

- This EMEA 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 (including, where applicable, the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR")), the company responsible for your Personal Data ("Invesco", "we" or "us") is shown in Annex 1.
- This EMEA 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 EMEA Recruitment Privacy Notice.
- This EMEA Recruitment Privacy Notice applies in the relevant countries where we operate in EMEA. Invesco respects the local data protection laws and regulations and, where relevant, key additional country-specific obligations are included in Annex 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 law requirements, we may collect information about you as shown in the table below. Please note that 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 italics 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; health and disability-related information</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 licence and/or passport/identity card; social security number (or equivalent in your country) and any other tax-related information; biometric information; information we obtain from background verification checks, including information relating to criminal convictions and offences</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) including remuneration, pension and benefits arrangements</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>Extra information that you or third parties such as your referees choose to provide to us (including Sensitive Personal Data)</td>
</tr>
</tbody>
</table>

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 referees; and
   • Twitter or similar 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.

How will we use your Personal Data and what is our legal basis for doing so?
This section of this EMEA Recruitment Privacy Notice provides a non-exhaustive list of purposes that
we may use your Personal Data for and the legal bases on which we rely to ensure that we process
your Personal Data lawfully:

<table>
<thead>
<tr>
<th>Purposes of the processing</th>
<th>Legal 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 legitimate interest in hiring appropriate Staff, where this interest does not override your interests or fundamental 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 Sensitive 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 Sensitive 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>

Retaining your personal data for future roles:
• If you are unsuccessful in your application for a role with Invesco, we may ask your permission to retain your application in the event that a suitable role at Invesco becomes available that we think you may be interested in applying for
• Processing is necessary to pursue our legitimate interest in hiring appropriate Staff, where this interest does not override your interests or fundamental rights or freedoms
• Processing is based on your consent
EMEA RECRUITMENT PRIVACY NOTICE

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 organisations 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 organisations, credit reference agencies and debt collection and tracing agencies;
• Third parties 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;
• Where appropriate, medical professionals such as your GP 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.

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 EMEA 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, within or outside the UK, European Economic Area (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein where the level of protection for the Personal Data is deemed adequate under applicable EU laws) and Switzerland. If your Personal Data is transferred to a jurisdiction where the level of protection for the Personal Data has not been deemed adequate by the European Commission (or by relevant bodies or applicable laws in countries outside the EU), e.g. United States or India, we put standard data
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.

How long do we hold your Personal Data for?

• Subject to your rights (as explained in this EMEA 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 law requirements in relation to immigration checks.

• In determining the appropriate retention period for different types of Personal Data, we always consider the amount, nature, and sensitivity of the Personal Data in question, the potential risk of harm from unauthorised use or disclosure of that Personal Data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above). Once we have determined that we no longer need to hold your Personal Data, we will delete it from Invesco Systems, or destroy any paper files and archives.

What are your rights in relation to the Personal Data we hold about you?

The GDPR gives you the following rights in relation to your Personal Data:

• Right to object to the processing of your Personal Data;
• Right to withdraw consent;
• Right to submit a data subject access request (DSAR);
• Right to erasure of your Personal Data;
• Right to restrict processing of your Personal Data;
• Right to rectification of your Personal Data;
• Right of data portability; and
• Right to lodge a complaint with your local supervisory authority, including in the EU Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your Personal Data infringes the GDPR.

Please note that these rights are limited and where legally permitted to do so, we may refuse your request to exercise these rights.

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 deal with your request without undue delay, and in any event within one month (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 which you raise.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

How can you contact us?

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

| Country in which you are a member of Invesco’s Staff | The Invesco entity responsible for processing your Personal Data will be your employer or the counterparty associated with the relevant arrangement with you (e.g. if you are a contractor) | 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 EMEA Recruitment Privacy Notice. |  
|---|---|---|  
| UK | Invesco UK Limited | HR Representative:  
emeahrservices@invesco.com |  
| Ireland | Invesco Global Asset Management DAC | Global Privacy Office:  
emea.privacy@invesco.com |  
| Jersey | Invesco International Limited |  
| Austria | Invesco Asset Management Österreich – Branch of Invesco Asset Management Deutschland GmbH |  
| Belgium | Invesco Management S.A., (Luxembourg) Belgian Branch |  
| Czech Republic | Invesco Real Estate TAM S.à r.l., odštěpný závod | HR Representative (EMEA):  
FRA-HumanResources@fra.invesco.com |  
| France | Invesco Management S.A., Succursale en France  
Invesco Real Estate TAM S.à r.l., French Branch | Global Privacy Office:  
emea.privacy@invesco.com |  
| Germany | Invesco Asset Management Deutschland GmbH |  
| Italy | Invesco Management S.A., Succursale Italia  
Invesco Real Estate TAM S.à r.l., Sede Secondaria |  
| Luxembourg | Invesco Management S.A., Invesco Real Estate Management S.à r.l. |  
| Netherlands | Invesco Management S.A., Dutch Branch |  
| Poland | Invesco Real Estate TAM S.à r.l. (Spółka Z Ograniczoną Odpowiedzialnością) Oddział w Polsce |  
| South Africa | Jemstep Inc., Branch Office |  
| Spain | Invesco Management S.A., Sucursal en España  
Invesco Real Estate TAM S.à r.l., Sucursal en España |  
| Sweden | Invesco Management S.A., (Luxembourg) Swedish Filial |  
| Switzerland | Invesco Asset Management (Schweiz) AG |  

## Annex 2 – Country Specific Variations to this EMEA Recruitment Privacy Notice

<table>
<thead>
<tr>
<th>Country</th>
<th>Notes and Variations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>N/A</td>
</tr>
</tbody>
</table>
| Belgium       | Where necessary, we will comply with any additional legal obligations to consult with our Staff under Collective Bargaining Agreements n°68 of 16 June 1998 and n°81 of 26 April 2002 and will only process Personal Data in a way that is consistent with the outcome of such consultation. 

**NOTE:** THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED |
| Czech Republic| We will not copy your passport or identity card without your consent. 

**NOTE:** THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED |
| France        | French law allows data subjects to give instructions regarding the retention, erasure and disclosure of their Personal Data after their death. In the absence of such instructions, their heirs will have the possibility of exercising certain rights over such Personal Data. 

**NOTE:** THIS APPENDIX WILL BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED |
| Germany       | A Data Protection Officer (Datenschutzbeauftragter/DPO) has been appointed in accordance with German national legislation (Bundesdatenschutzgesetz). His contact details are:  

Leif Baumann  
Direct line: +49 (0)69 298 07 374  
Facsimile: +49 (0)69 298 07 550  
Email: Leif_Baumann@fra.invesco.com  
Address: An der Welle 5  
60322 Frankfurt  
Germany  

**NOTE:** THIS SECTION WILL BE UPDATED IN DUE COURSE |
| Ireland       | **NOTE:** THIS APPENDIX MAY BE UPDATED TO REFLECT ANY ADDITIONAL OBLIGATIONS THAT INVESCO MUST COMPLY WITH UNDER IRISH DATA PROTECTION LAW |
| Italy         | In accordance with Law 167 of 20 November 2017, Invesco is entitled to reuse of data (including Sensitive Personal Data, but not genetic data), provided that appropriate data minimisation and anonymisation measures are used. 

**NOTE:** THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED |
| Jersey        | If you are resident in Jersey, you have the right to lodge a complaint with the Office of the Information Commissioner in Jersey by visiting www.dataci.je, if you consider that the processing of your Personal Data infringes the GDPR or the Data Protection (Jersey) Law 2018.  

If you are resident in Jersey, the time for complying with any of the data subject rights set out in this EMEA Recruitment Privacy Notice is 4 weeks rather than one month.  

**NOTE:** THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED |
| Luxembourg    | **NOTE:** THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED |
| Netherlands   | N/A                                                                                                                                                   |
| Poland        | **NOTE:** THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED |

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**EMEA RECRUITMENT PRIVACY NOTICE**
IMPLEMENTING LAW HAS BEEN FINALISED

South Africa  In collecting your Personal Data, we will take all reasonable and practical steps to ensure that you are aware whether the supply of information is voluntary or mandatory and the consequences of failing to provide the information e.g. if you fail to provide the information we requested we may not be able to progress with your application.

You have the right to access your Personal Data and this Privacy Notice explains how you can contact us to exercise that right.

We rely on your consent to the processing of your Personal Data as set out in this EMEA Recruitment Privacy Notice.

You have the right to lodge a complaint with the Information Regulator (South Africa) (Address: SALU Building, 316 Thabo Sehume Street, PRETORIA; Tel: 012 406 4818; Fax: 086 500 3351; email: info@justice.gov.za).

We will not process your Sensitive Personal Data unless:

- processing is carried out with your consent;
- processing is necessary for the establishment, exercise or defence of a right or obligation in law;
- processing is necessary to comply with an obligation of international law;
- processing is for historical, statistical or research purposes to the extent that:
  1. the purpose serves a public interest and the processing is necessary for the purpose concerned; or
  2. it appears to be impossible or would involve a disproportionate effort to ask for consent, and sufficient guarantees are provided for to ensure that the processing does not adversely affect your privacy to a disproportionate extent;
- information has deliberately been made public by you; or
- the specific requirements contained in the Protection of Personal Information Act relating to these categories of personal information have been met.

NOTE: THIS APPENDIX MAY NEED TO BE UPDATED WHEN THE PROTECTION OF PERSONAL INFORMATION ACT HAS BEEN ENACTED.

Spain  In accordance with local law, we have the right to refuse to act on your DSAR if (i) such right has already been exercised within the previous 12 months, except when there is a legitimate interest; or (ii) a Spanish or European law does not allow us to reveal the processing of such data.

Your right to rectification and deletion can be denied if: (i) it is necessary to keep the relevant Personal Data for legal or contractual reasons; or (ii) a Spanish or European law does not allow us to reveal the processing of such data.

NOTE: THIS APPENDIX MAY NEED TO BE UPDATED WHEN LOCAL IMPLEMENTING LAW HAS BEEN FINALISED

Sweden  According to the Swedish Data Protection Regulation (2018:219), we will only process details about criminal convictions if the processing is necessary to:

1. establish, enforce or defend legal claims; or
2. fulfil a legal or regulatory obligation.

NOTE: THIS APPENDIX MAY NEED TO BE UPDATED FOLLOWING FURTHER GUIDANCE FROM THE SWEDISH DATA PROTECTION AUTHORITY
### Switzerland

The Swiss Federal Data Protection Act ("SFDPA") applies to our processing of Personal Data in connection with our management of your relationship with us in Switzerland. References to the GDPR are, for the purposes of this EMEA Recruitment Privacy Notice, references to the SFDPA.

To comply with Swiss data protection and employment laws, we refrain from using social media sites (except LinkedIn and other business-related sites) as a source of Personal Data processed in connection with our management of your relationship with us in Switzerland. Exceptions apply where this is required to prevent misuse of Invesco Systems, investigate infringements of applicable policies or necessary to protect the confidentiality, integrity and availability of Personal Data and for other security purposes.

**NOTE:** THIS APPENDIX MAY BE UPDATED WHEN ADDITIONAL LOCAL DATA PROTECTION LAWS COME INTO FORCE

### UK

**NOTE:** THIS APPENDIX MAY BE UPDATED TO REFLECT ANY ADDITIONAL OBLIGATIONS THAT INVESCO MUST COMPLY WITH UNDER THE DATA PROTECTION ACT 2018
### Annex 3 – Glossary

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>EMEA</td>
<td>Europe, the Middle-East and Africa.</td>
</tr>
<tr>
<td>General Data Protection Regulation (the &quot;GDPR&quot;)</td>
<td>a European Union statutory instrument which aims to harmonise European data protection laws. It came into effect on 25 May 2018, and any references to it should be construed to include any national legislation implementing it.</td>
</tr>
<tr>
<td>Invesco Systems</td>
<td>Invesco Systems include, but are not limited to:</td>
</tr>
<tr>
<td></td>
<td>• 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.</td>
</tr>
<tr>
<td></td>
<td>• All Invesco owned, licensed, and/or provided software;</td>
</tr>
<tr>
<td></td>
<td>• 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</td>
</tr>
<tr>
<td></td>
<td>• 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.</td>
</tr>
<tr>
<td>Personal Data</td>
<td>This means any information relating to an identified or identifiable natural person (&quot;data subject&quot;); 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”;</td>
</tr>
<tr>
<td>Recruitment</td>
<td>This refers to individuals who are seeking employment as members of Invesco’s Staff.</td>
</tr>
<tr>
<td>Sensitive Personal Data</td>
<td>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.</td>
</tr>
<tr>
<td>Staff</td>
<td>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 EMEA Recruitment Privacy Notice.</td>
</tr>
</tbody>
</table>