

RECRUITMENT PRIVACY NOTICE

We understand that your privacy is important to you. We, as the hiring company, may process your personal and sensitive data in our capacity as personal information controller. We are committed to respecting your privacy and protecting your personal and sensitive data, which is any information that is capable of identifying you as an individual person.

This Recruitment Privacy Notice (“Privacy Notice”) describes how we handle and protect your personal data in connection with our recruitment processes and programs.

As used in this Privacy Notice:

- “personal data” means any information whether recorded in a material form or not, from which your identity is apparent or can be reasonably and directly ascertained by us, or when put together with other information would directly and certainly identify you;
- “sensitive data” means personal information about an individual’s race, ethnic origin, marital status, age and religious, health, education, sexual orientation, or any proceeding for any offense committed or alleged to have been committed by such individual, the disposal of such proceedings, or the sentence of any court in such proceedings, social security numbers, previous or current health records or such other sensitive personal information as defined in Section 3(1) of the Data Privacy Act of 2012;
- “processing” means any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data.

This Privacy Notice only applies to the personal data of job applicants, potential candidates for employment, and our recruiting programs and events. It does not apply to our employees, contractors or clients, or other personal data that we collect for other purposes. These personal data are either submitted to us as part of the online application and/or through alternative channels (e.g., via professional recruitment firms and third-party recruitment platforms).

We will process your personal and sensitive data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of Republic Act No. 10173 (Data Privacy Act of 2012), its implementing rules and regulations and other applicable laws (the “Relevant Laws”), in which case, the Relevant Laws will prevail.

By submitting your personal and sensitive data to us, you acknowledge that:

- You have read and understood this Privacy Notice and agree to the processing of your personal data as set out herein.
- You are not required to provide any of the requested information to us, but failure to do so may result in the discontinuance of your candidacy for the job for which you have applied.
- All your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate, incomplete and false information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment which is or may be offered to you.

What Personal Data We Collect

We will collect personal data about you when you apply for a role with us, such as your name, address, contact information, work and educational history, achievements, test results, video interviews, personality profiles, and such other information which may be required by us to help us assess your suitability to your desired role. We also may collect personal data about you from third parties, such as your references, prior employers, and third party employment background check providers to the extent that is permitted by applicable law.

Other sensitive personal data, as defined in Sec. 3(l) of the Data Privacy Act of 2012 such as race, health, philosophical and religious beliefs, sexual orientation, among others, will not be collected by us unless required by the recruitment processing and profiling and in compliance with the Relevant Laws, but always subject to protection in compliance with the Data Privacy requirements.

How Will Your Personal Data Be Used

We collect and use your personal data for legitimate human resources and business management reasons including:

- identifying and evaluating your profile for potential employment, as well as for future roles that may become available;
- recordkeeping in relation to recruiting and hiring;
- conducting criminal history checks as permitted by applicable law;
- protecting our legal rights to the extent authorized or permitted by law; or
- emergency situations where the health or safety of one or more individuals may be endangered.

We may also analyze your personal data or aggregated/pseudonymized data to improve our recruitment and hiring process and augment our ability to attract successful candidates.

We also partnered with Talocity Instasolutions Private Limited (“Talocity”) to manage the initial filtering of our candidate’s profiles through video interviews, social profile mapping,

and video analytics using artificial intelligence engine that is offered within Talocity platform. When you start or submit your video interview, the platform also captures your eyeball and facial movements, including your tone/pitch/pace of voice to analyze your personality and evaluate your profile based on the five well-known dimensions of OCEAN Personality Model that influence occupational success and help understand the workplace behavior. When you apply, FWD will share your name, phone number and email address to Talocity to contact you and conduct the initial screening and profiling process. Shortlisted candidates will then be contacted by FWD for the face-to-face interview. For more information, please refer to [Talocity Terms and Conditions](#) and [Talocity Privacy Policy](#).

To Whom Will Your Data Be Shared

We may share your personal and/or sensitive data with the FWD hiring managers and other relevant internal stakeholders in connection with your job application. We may also share your information to and from third party service providers that may assist us in recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruitment practices.

We maintain mechanisms designed to ensure that any processing of personal and/or sensitive data by third-party service providers is consistent with this Privacy Notice and the Relevant Laws, and protects the confidentiality, availability, and integrity of your personal data. We set contractual provisions with our third party providers to ensure adequate protection of your personal and sensitive data is in place.

In addition, in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business, we may disclose or transfer your personal and/or sensitive data.

How Long Will Your Data Be Retained

If you accept our offer of employment, any relevant personal and/or sensitive data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with the Relevant Laws.

If we do not employ you, we may nevertheless continue to retain and process your personal data for a period of five (5) years for system administration purposes, to consider you for potential future employment opportunities, and to perform research. After expiry of the retention period, we will securely destroy your personal information in accordance with our Data Retention and Disposal Policy such as shredding the physical records and deletion or anonymization of electronic data or any other secure disposal methods allowed by relevant regulations.

Opt-out option:

I do NOT want my personal data to be retained by FWD.

In case FWD does not employ you for the job that you are currently applying for, you may send an email to careers.ph@fwd.com if you do not want your personal data to be retained by FWD for 5 years, for purposes mentioned above which

includes considering and contacting you for potential future employment opportunities.

In some circumstances we will anonymize your personal information so that it can no longer be associated with you and in which case, we will use such information without further notice to you. Anonymized data can be retained for more than five (5) years.

Proper Security in Place

We follow strict security procedures to ensure that your personal data is not modified, damaged or disclosed to a third party without your permission and to prevent unauthorized access. We have established and implemented various protection measures to secure your personal information, among others (but not limited to):

- Management of Human Resources (confidentiality contractual obligations, conduct of internal trainings and awareness campaigns, certification and memberships in professional organizations);
- Conduct of privacy impact assessments (periodically and for every change in our processing);
- Physical security (locked cabinets, restricted access to information processing facilities, clean desk policies);
- Network and Computer Securities (firewall, encryption, logical access controls, data loss prevention, malware management, log monitoring);
- Onsite and offsite backup of your personal data and the processing systems;
- Vulnerability assessment and penetration testing for systems; and,
- Third Party Risk Management (due diligence, contract, access management, audit);

Unless shared to our outsourced business processors, FWD Group and affiliates, distributors and authorized representative of FWD Philippines as stated above, all of the information we collect or record is restricted to our offices. Only persons who need the information to fulfill their duties under contract are granted access to your personal data.

What Are Your Rights

As a data subject, you may have the following rights granted to you by the Data Privacy Act, its Implementing Rules and Regulations and other related issuances:

- Right to be informed on the processing of your personal data;
- Right to object the processing or sharing of your personal data;
- Right to request access to the personal data that we have collected about you for the purposes of reviewing, modifying, or requesting deletion of the data;
- Right to request a copy of the personal data we have collected about you;
- Right to make changes with regard any of your personal data;
- Right to suspend, withdraw or order the blocking, removal or destruction of your personal data from our system;

- Right to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal data, considering any violation of your rights and freedoms as a data subject; and
- Right to file a complaint

Contact Us

If you would like to exercise any of your rights as enumerated in the previous paragraph, you may send a note to careers.ph@fwd.com.

To help protect your privacy and security, we will take reasonable steps to verify your identity before granting you access to your personal and/or sensitive data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Depending upon the circumstances and the request, we may not be permitted to provide access to personal data or otherwise fully comply with your request; for example, where producing your information may reveal the identity of someone else. We reserve the right to charge an appropriate fee (if any fee may be charged to us by third parties) for complying with your request where allowed by applicable law, and/or to deny your requests where, in our discretion, they may be unfounded, excessive, or otherwise unacceptable under Relevant Laws.

If you have privacy concerns, has belief that your personal information has been breached or your rights as a data subject have been violated, you may contact our Data Protection Office at dataprotection.ph@fwd.com.

Changes to our Privacy Notice

We may update our Privacy Notice from time to time without prior notice. You are advised to review this Privacy Notice periodically for any changes. This Privacy Notice is last updated on 17 March 2020.