

Job Applicant Privacy Notice

Effective May 20th, 2024

Tokio Marine Europe S.A. and its branches (under the trading name of Tokio Marine HCC) (“TME” or the “Company”) are committed to protecting the privacy of personal data of all individuals. This Privacy Notice (“Notice”) applies to individuals who apply to work for the Company, including any current employees who may apply for new positions with the Company (“Applicant”). This Notice describes the personal data we collect and how we use it when you apply for a job with us.

This Notice provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (“GDPR”) and any local data protection law. Our Company acts as data controller under this Notice. This means that we are responsible for deciding how we hold and use personal data about you.

This Notice does not address your interactions with TME outside the context of applying for employment with the Company such as browsing TMHCC’s website or checking out TMHCC’s insurance products or services online as a prospective or actual customer. For information on how we collect and use personal data related to those types of interactions, please see our [Online Privacy Policy](#).

What personal data do we collect?

Subject to applicable law, we collect only the personal data that is reasonably necessary and proportionate to achieve our recruiting and hiring purposes for Applicants. We may collect the following personal data (this could be personal data that you would have voluntarily provided to us on your cv/résumé):

- **Identification data** such as your name, gender, photograph, date of birth
- **Contact details** such as home and business address, telephone/email addresses, emergency contact details
- **Employment details** such as job title/position, office location, employment contract, performance and disciplinary records (for internal applications only)
- **Background information** such as academic/professional qualifications, education, CV/résumé, criminal records
- **Government or national identifiers** such as government issued ID/passport, immigration/visa status, social security
- **Information on your spouse/partner and/or dependents** such as your marital status, identification and contact data about them and information relevant to any benefits extended to such people (only for the purpose of providing insurance coverage)
- **Financial information** such as bank details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants

- **Profession or employment-related information** such as references, pre-employment test results, including psychometric or personality tests,
- **IT information** such as information required to provide access to company IT systems and networks (and information collected by / through those systems) such as IP addresses, log files and login information.

As a general rule, we try not to collect or process any sensitive personal data about you, unless where necessary to comply with applicable laws or to provide benefits.

How is personal data collected?

We collect personal data about Applicants from a variety of sources, which may include:

- Directly from you
- Previous and current employers or references
- Service providers such as recruiters or recruitment agencies
- Online, publicly available sources including social network and recruiting sites such as LinkedIn.

How is personal data used?

We use your personal data for a limited number of purposes, which may include any of the following, subject to applicable law:

- Processing and review of your job application, including any cover letter, resume, and/or references
- Determining your eligibility for employment and assessing your skills, qualifications, and interests in a particular position
- Contacting you if we need more information, including scheduling or conducting an interview
- Verifying your information and carrying out employment, background, and reference checks, subject to applicable law
- Complying with legal, compliance, and regulatory requirements
- Protecting the interests of TMHCC, other job applicants, our employees, or the public
- Detecting and protecting against security incidents or violations of TMHCC's policies or the law

We may also combine the information we collect ("aggregate") or remove pieces of information ("de-identify") to limit or prevent identification of any particular individual to help with goals like research and improvement of our recruitment processes.

Who is your personal data shared with?

We may share your personal data with the following parties but only on a need-to-know basis and subject to applicable law:

- Other companies within the TMHCC group to the extent necessary to administer the recruitment, hiring, or employment process

- Third party service providers to the extent necessary for the recruitment and/or hiring process such as a recruitment agency, background screening agency, or any professional advisor
- Any other third party or government agency when we have a legal basis to do so such as with the consent or authorization of the Applicant or to comply with or respond to a valid legal process or law enforcement request

How long is personal data retained for?

We will keep your personal data on our records for as long as we have an ongoing legitimate business need to do so in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law. We will delete your data once the legal obligation expires or after the period of time specified in our records retention policies. The period of retention is subject to our review and alteration.

If you are hired, your application information becomes part of your employment record, and we may use it in connection with your employment consistent with our Employee Privacy Policy. If you are not hired or decline an offer of employment, with your consent, we keep your application to allow you to obtain information about the recruitment process and to consider you for other job openings.

Your rights as data subject

Depending upon where you reside, you may have any or all of the following rights in connection with your personal data:

- Know the categories and/or specific pieces of personal data collected about you, including how we process and share that certain information generally;
- Request access to the personal data we retain about you;
- Request deletion of your personal data ;
- Direct us to correct your personal data if you are unable to correct that personal data through our career sourcing platform;
- Restrict how we use certain personal data or your sensitive personal data for certain purposes;
- Object to or limit the processing of your personal data;
- Request that we transfer your personal data to another entity; and
- Request that we not reach decisions affecting you using automated processing or profiling.

We may verify your identity in connection with any of the above requests and take steps to ensure that only you or your authorized representative can exercise rights with respect to your personal data.

Please be aware that if you exercise your right to object or your rights of restriction or deletion, or if you choose to decline to share certain information with us, we may not be able to assess your suitability for (continued) employment.

If we have collected and processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data that was lawfully collected on grounds other than consent.

Although we do not sell your personal data, we allow certain companies to place tracking technologies such as pixels or cookies on our sites, including our career page. Those companies receive information about your interaction with our sites that is associated with your browser or device, which information may be used to improve our site and user experience.

To exercise any rights you may have in connection with your personal data, you can email us at dpo-tmelux@tmhcc.com.

Data Security

TMHCC is committed to keeping your personal data safe. We have appropriate security measures in place designed to protect against the unauthorized access, loss, misuse, disclosure and alteration of personal data under our control. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our specific instructions and they are subject to a duty of confidentiality.

Changes to this Policy

We may update this Policy from time to time in response to changing legal, technical, or business developments. When we update our Policy, we will take reasonable measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Policy changes if and where this is required by applicable privacy laws if we use your personal data in a manner not reasonably expected by you.

You can see when this Policy was last updated by checking the “effective date” displayed at the top of this Policy.

Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

Questions

If you have any questions about this Policy and are applying for employment with the Company, please contact us using the following contact details:

Email: dpo-tmelux@tmhcc.com

In certain jurisdictions, if we do not resolve your complaint to your satisfaction, you have the right to complain to a data protection authority or regulatory agency of competent jurisdiction about our collection and use of your personal data. For more information, please contact your local data protection authority or regulatory agency of competent jurisdiction. In the table below we have listed the contact details of the data protection authorities:

Luxembourg

Commission Nationale pour la Protection des Données
1, avenue du Rock'n'Roll
L-4361 Esch-sur-Alzette
Tel.: +352 2610 60 1
E-Mail: info@cnpd.lu
Website: <http://www.cnpd.lu/>

Branches:

Belgium

Autorité de la protection des données - Gegevensbeschermingsautoriteit (APD-GBA)
Rue de la Presse 35 – Drukpersstraat 35,
1000 Bruxelles – Brussel
Tel.: +32 2 274 48 00
E-Mail: contact@apd-gba.be
Website: <https://www.autoriteprotectiondonnees.be/>
<https://www.gegevensbeschermingsautoriteit.be/>

Denmark

Datatilsynet
Carl Jacobsens Vej 35
2500 Valby
Tel. +45 33 1932 00
Fax +45 33 19 32 18
E-Mail: dt@datatilsynet.dk
Website: <http://www.datatilsynet.dk/>

France

Commission Nationale de l'Informatique et des Libertés - CNIL
3 Place de Fontenoy,
TSA 80715 – 75334 Paris, Cedex 07
Tel.: +33 1 53 73 22 22
Website: <http://www.cnil.fr/>

Germany

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit
Graurheindorfer Str. 153
53117 Bonn
Tel.: +49 228 997799 0
E-Mail: poststelle@bfdi.bund.de
Website: <http://www.bfdi.bund.de/>

Ireland

Data Protection Commission
21 Fitzwilliam Square
Dublin 2
D02 RD28
Tel.: +353 76 110 4800
E-Mail: info@dataprotection.ie
Website: <http://www.dataprotection.ie/>

Italy

Garante per la protezione dei dati personali
Piazza di Monte Citorio
121, 00186 Roma
Tel.: +39 06 69677 1
E-Mail: garante@garanteprivacy.it
Website: <http://www.garanteprivacy.it/>

Netherlands

Autoriteit Persoonsgegevens
Bezuidenhoutseweg 30
P.O. Box 93374
2509 AJ Den Haag/The Hague
Tel.: +31 70 888 8500
Website: <https://autoriteitpersoonsgegevens.nl/nl>

Norway

Datatilsynet
Tollbugata 3
0152 Oslo
Tel.: +47 22 39 69 00
E-Mail: postkasse@datatilsynet.no
Website: www.datatilsynet.no

Spain

Agencia Española de Protección de Datos (AEPD)
C/Jorge Juan
6, 28001 Madrid
Tel.: +34 91 266 3517
E-Mail: internacional@aepd.es
Website: <https://www.aepd.es/>