

## CANDIDATE PRIVACY NOTICE

### 1 WHY DO WE HAVE THIS NOTICE?

Sotheby's is a **data controller** and is responsible for processing personal information about you. This notice is applicable to you if you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

We are committed to complying with data protection law. Any questions concerning this notice should be sent to the HR Department.

### 2 WHAT INFORMATION MIGHT WE HOLD ABOUT YOU?

In connection with your application for work with us, we may collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your CV and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview.

We may also collect, store and use the following special categories of more sensitive personal information (Special Categories):

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

### 3 HOW IS THIS INFORMATION COLLECTED?

We collect personal information about you from the following sources:

- You, the candidate.
- Recruitment agencies, from which we may collect the following categories of data: employment history, right to work, compensation history, personal contact details, gender.
- Background check providers, from which we may collect the following categories of data: employment history, criminal convictions and offences, compensation history.

- Your named referees, from whom we collect the following categories of data: dates of employment and job title.

#### **4 HOW DO WE USE THIS INFORMATION?**

We may use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the position.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you and to process your personal information to make this decision. We are also permitted to process this information to take steps prior to entering into any potential agreement with you.

#### **5 HOW DO WE USE YOUR SPECIAL CATEGORIES OF PERSONAL INFORMATION?**

We may use your particularly sensitive personal information in the following ways (to comply with our legal obligations and/ or to monitor equality issues):

- We may use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

#### **6 INFORMATION ABOUT CRIMINAL CONVICTIONS**

We do not envisage that we will process information about criminal convictions.

#### **7 AUTOMATED DECISION-MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

#### **8 DATA SHARING**

We will only share your personal information with the following third parties for the purposes of processing your application, including but not limited to, Greenhouse Software. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies.

#### **9 DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 10 DATA RETENTION

We will retain your personal information for a period of 5 years after we have communicated to you our decision about whether to appoint you to the position. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our Retention and Erasure Guidelines, unless you are employed or engaged by us at the time, in which case we may retain your personal data in accordance with our Employee Privacy Notice.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## 11 RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

## 12 QUESTIONS AND COMPLAINTS



If you have any questions about this privacy notice or how we handle your personal information, please contact [hr@sothebys.com](mailto:hr@sothebys.com). You have the right to make a complaint at any time to the Chief Information Security Officer (CISO).