

Sotheby's Recruitment Privacy Notice

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This privacy notice describes how Sotheby's, Inc. and each of its affiliates ('we', 'us' 'Sotheby's) collects and processes personal information about you, how we use and protect this information, and your rights in relation to this information.

This privacy notice describes the handling of personal information obtained about job applicants through the Sotheby's online recruitment system and recruitment page which link to this privacy notice (together, the "recruitment system") directly by job applicants as well as by third party agencies and recruiters on behalf of candidates. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

1. PERSONAL INFORMATION WE USE

1.1 Information we collect directly from you

The categories of information that we collect directly from you are:

- (a) personal details (e.g. name, date of birth)
- (b) contact details (e.g. phone number, email address, postal address or mobile number)
- (c) username and password for the recruitment system
- (d) information contained in your resume or CV, and other documents related to the application or recruitment process (e.g. cover letter, transcripts, certifications)
- (e) educational details (e.g. educational history, qualifications, certifications, skills)
- (f) information for diversity monitoring (such as race, ethnicity, ability status, gender, national origin, religion and sexual orientation), where legally permitted. Where we obtain consent to collect and process this type of sensitive information, you have the right to withdraw consent at any time
- (g) information about family and dependants, where legally permitted
- (h) information about any health issues or disabilities, where legally permitted
- (i) citizenship or immigration information, where legally permitted

- (j) CCTV on our premises
- (k) other information you may choose to submit to us in connection with your application.

1.2 Information Automatically Collected

We and the provider of our Recruitment System, Greenhouse also collect information about you using cookies and similar technologies ('cookies') about visits to and usage of the recruitment system using Google Analytics and Greenhouse cookies when you use our online recruitment system. This information may include your Internet Protocol (IP) Address, technical information about browsers and devices used to access the recruitment system, and information about crashes or other technical issues.

The information collected using Google Analytics and Greenhouse is generally aggregated to analyze and improve the quality and reliability of the recruitment system. These cookies are not used to make employment-related decisions, they allow us to collect information on how the recruitment system is used and to report on the recruitment system usage statistics. You can find more information, including details on how to opt-out of Google Analytics cookies [here](#).

1.3 Information we collect from other sources:

We may collect the following information about you from other sources:

- (a) background check information from employment screening agencies or publicly available registers (as allowed by law)
- (b) publicly available professional profiles on websites or social media (e.g. LinkedIn)
- (c) certifications, awards, memberships, or other information associated with professional or regulatory bodies
- (d) information about your performance or conduct from referees, other Sotheby's employees, clients or service providers you work with who may provide feedback about you, where legally permitted
- (e) information about your relationship with the Sotheby's group of companies, including prior work experience or association you may have with any current or former Sotheby's employees, where legal permitted.

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information to:

- (a) create and manage the recruitment system and job applications
- (b) assess your skills, qualifications and interests against the position applied for or other positions within the Sotheby's group of companies
- (c) communicate with you in relation to your application and the recruitment process
- (d) verify your information, including through reference checks and, where applicable, background checks, where legally permitted

- (e) send you information about other positions with the Sotheby's group of companies which may be of interest to you
- (f) back up our recruitment system (including for disaster recovery purposes) and enhance the overall security of this system
- (g) operate, evaluate and improve the recruitment system, our application tracking and recruitment activities and communications (this includes analysing our job applicant base, our hiring practices or trends, identifying qualifications or skills shortages, and using information to match candidates and potential opportunities)
- (h) detect, prevent and respond to fraud or potentially illegal activities, misuse of the recruitment system, intellectual property infringement or other violations of law, this Privacy Notice or other Sotheby's policies
- (i) perform audits, assessments, maintenance and testing or troubleshooting activities related to the recruitment system
- (j) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies
- (k) fostering our diversity and inclusion programs and practices, where legally permitted
- (l) deal with your enquiries and requests.

In some jurisdictions and/or under certain circumstances, and to the extent required under local law, we must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfil our contractual obligations to you in connection with your employment contract with us
- (b) to comply with our legal obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering obligations or obtaining proof of your right to work status to enable us to meet relevant obligations
- (c) to comply with our legal obligations to you, for example health and safety obligations that we must comply with as your employer or to a third party (e.g. the taxation authorities)
- (d) to meet our legitimate interests, for example to conduct our recruitment processes efficiently and fairly, or to manage applicants and our employees effectively and protect us against theft or other crime. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms
- (e) to protect your or another person's vital interests, for example by providing your health information to a doctor in a medical emergency.

Please note that we may be required by law to collect certain personal information about you for recruitment purposes, or as a consequence of our relationship with you as an employer. Failure to

provide this information may prevent or delay the fulfilment of these obligations. We will inform you at the time of collection about the personal information that we require you to provide.

We may obtain your explicit consent to collect and use certain types of personal information when we are required to do so by law (for example, in certain jurisdictions when we process sensitive personal information). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.

3. **YOUR RIGHTS OVER YOUR PERSONAL INFORMATION**

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- rectify the information we hold about you
- erase your personal information
- restrict our use of your personal information
- object to our use of your personal information
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- lodge a complaint with your local data protection authority
- where applicable, provide guidance about the processing of your personal data after your death.

If you would like to discuss or exercise such rights, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

4. **AUTOMATED DECISIONS ABOUT YOU**

The way we analyse personal information for the purposes of recruitment may involve profiling, which means that we may process your personal information using software that is able to evaluate your personal aspects and predict risks or outcomes. For example, we may use automated tools to evaluate the suitability of applicants for certain job roles. We do not use such tools to make decisions about your employment, compensation, or other matters that have a significant impact on you without human intervention.

5. **INFORMATION SHARING**

We may share your personal information with third parties under the following circumstances:

- **Service providers and business partners.** We may share your personal information with our service providers and business partners that perform business operations for us. For example, we may partner with other companies to host the recruitment system and analyse

information to improve performance and with service providers that assist us with carrying out background checks where required and where legally permitted.

- **Sotheby's group companies.** We work closely with other businesses and companies that fall within the Sotheby's group of companies. We may share certain information such as your details in connection with your job application with other Sotheby's companies for recruitment purposes, human resource management and internal reporting.
- **Law enforcement agency, court, regulator, government authority or other third party.** We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- **Asset purchasers.** We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

6. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures (such as implementing security software and only allowing staff to access your information if there is a business need to do so) to ensure a level of security appropriate to the risk to the personal information we process. Our servers also use up-to-date encryption methods, minimum standards for passwords and physical locks to protect personal data. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information until the position you are applying for has been filled, after which we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis, understanding market trends and/or audit purposes
- Comply with record retention requirements under the law or other relevant legal or regulatory requirements
- Defend, establish, exercise or bring any existing or potential legal claims
- Ensure fraud detection and prevention
- Deal with any queries or complaints you may have.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

7. INTERNATIONAL DATA TRANSFER

Your personal information may be transferred to, stored, and processed in a country or region that is not regarded as ensuring an adequate level of protection for personal information.

We have put in place appropriate safeguards (such as contractual commitments recognized by local law that establish adequate protections) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

8. CONTACT US

Sotheby's, Inc. is the overall controller responsible for the personal information we collect and process and the Sotheby's entity to which a particular job opening relates to (as identified in the relevant job posting) may also be a controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact hr@sothebys.com.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to your local data protection authority.

9. CHANGES TO THE POLICY

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time.

We may modify or update this privacy policy from time to time to reflect changes in our privacy practices or applicable laws and will publish the updated version on the recruitment system. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

31 JANUARY 2022