



Applicant Privacy Statement

Last Updated: 18 Feb 2025

APi Group, Inc (“**APi Group**”), of 1100 Old Highway 8 NW, New Brighton, Minnesota, 55112, USA, has prepared this Applicant Privacy Statement (“**Statement**”) on behalf of itself and its subsidiaries and in connection with recruitment and pre-employment activities. The purpose of this Statement is to give you information about how APi Group collects, processes, stores and otherwise uses identified or reasonably identifiable information about you as an applicant (“**personal information**”) in connection with recruitment and pre-employment activities.

APi Group will process your personal information in accordance with applicable data protection laws and this Statement. In certain limited circumstances, we may need to ask for your specific consent to process your personal information in a particular way. However, in most cases, we will process it for the reasons set out in this Statement, and it would not be appropriate or necessary for you to provide consent.

Please read this Statement carefully before submitting personal information to APi Group as part of the application process.

When we say “we” or “us” in this document from this point on, we mean APi Group and the entity with which you have applied for a position to begin the recruitment process. In addition, you will see a number of references to “**APi Group Affiliates**”, which includes all other subsidiaries of APi Group worldwide (details of these can be obtained from our HR Department).

APi Group may update this Statement from time to time, for example if APi Group implements new systems or processes that involve the use of personal information.

Please note that our websites will contain Website Privacy Notice(s). That notice should be read as a companion to this Statement, and the provisions of both will apply to you. In the event of a conflict between such documents, this Statement will govern any matters related to your application for employment and related activities. .

This Statement is intended to cover all applicants, so some of the practices described in this Statement may not apply to you. This Statement contains certain jurisdiction-specific terms at the end, may be supplemented with a local notice where required by law or to reflect local or regional practices.

What personal information do we collect about you?

The personal information that we collect and process varies depending upon our relationship and interactions with you throughout the application process. In this Statement “personal information” means any information that relates to a specific individual; the term does not include anonymous or

This document is reviewed periodically and may be changed, deleted or discontinued at the sole discretion of APi Group at any time and without notice. Please ensure you refer to the most recent version of this policy.



de-identified data. However, our collection and processing of your personal information is subject to local law. Therefore, the below list of personal information may include elements we do not collect in your case as a result of such local requirements. If you have any questions regarding the personal information we collect in your specific case, please contact us. As part of our recruitment and pre-employment activities, we may collect and process personal information that you provide to us, as well as personal information about you that is provided on your behalf, such as by your references. This information generally includes:

- **Identification Data**, such as your name, marital status, employee/Staff ID, business email address, business address, business landline, citizenship, nationality, visa status, passport data, national insurance or other social security number, bank details, health insurance and governmental retirement plan information and tax reference, background check information, CV, and application form;
- **Personal Information**, such as your date and place of birth, emergency contact details, and gender;
- **Contact Details**, such as your home address, telephone number and email address;
- **Professional and Employment-Related Information**, such as professional qualifications, prior employment history, education history, additional information included in your CV, and references;
- **Interview Information** such as notes collected by interviewers and other professional assessment information;
- **Pre-employment Screening**: If we offer you a job, we may collect additional background information such as credit history and eligibility information (as permitted by law);
- **Sensitive Personal Information (where permitted and in accordance with applicable law)** such as social security number, driver's license number, racial or ethnic origin, trade union membership, veteran status, health and medical information (including where required, drug screening results), sexual orientation, and/or criminal history.

In many instances, the provision of any personal information that would be considered to be sensitive or constitute special categories of personal information listed above is voluntary, and if you decide not to share these with us, not doing so will not impact your application. Providing your personal information to us is voluntary, but we may have a legal obligation to collect it and, in certain instances, we will not be able to process your application for employment without the requested personal information.

If you provide the personal information of another person, such as your professional references, we assume you have their permission to share their information with us.



How do we collect your personal information?

We collect your personal information in the following ways, pursuant to applicable law:

- **Directly From You**, when you create an account and profile in the Careers portal; share your resume with us via the Careers portal or through other means; and/or participate in interviews or other recruitment activities.
- **Other Sources**, including employment or recruitment agencies, background check providers, references, or other publicly available databases and sources.

For information about our collection of personal information via cookies and similar tracking technologies, and the choices you have regarding our use of cookies and related information collection, please see <https://chubbfs.com/worldwide-en/cookie-policy/>

How do we use your personal information?

We use your personal information for the following business purposes associated with the administration of your application and our general business operations:

- To review and consider your application.
- For pre-employment screening, if we decide to offer you employment.
- To consider you for current or future opportunities in any of the API Group Affiliates.
- To administer recruitment and staffing activities.
- To manage and improve our recruitment processes and our business operations related to the recruitment process.
- To comply with applicable laws, legal obligations and/or protect our legal interests.
- To operate our business, consider and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions, and otherwise related to the administration and/or planning of our general business, accounting, auditing, compliance, recordkeeping, and legal functions.



What is our legal basis for collecting and using your personal information?

Where required by applicable law, APi Group relies on one or more of the following legal grounds for the collection, processing, and use of your personal information (the “**Processing Purposes**”):

- Completing and administering the employment applicant process.
- APi Group’s legitimate interest in conducting and managing our business as a global organization and administering the recruiting process in particular.
- Consent (or explicit consent for sensitive personal information), as required by applicable law, and in such cases you have the right to withdraw your consent at any time.
- Compliance with legal obligations, particularly in the area of labor and employment law, social security, data protection law, tax law, and corporate compliance laws.

We appreciate that there is a lot of information here, and we want to be as clear with you as possible about what this means. Where we talk about our legitimate interests or those of third parties, this can include:

- Assessing your suitability for other roles within APi Group;
- Implementation and operation of a group-wide organisational structure and group-wide information sharing;
- Right to freedom of expression or information, including in the media;

When relying on the legitimate interests basis for processing your personal information, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal information to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

If we do seek to rely on your consent to process Personal information or Sensitive Data, we will specify how you can withdraw that consent at the time your consent is sought.

To whom do we disclose your personal information?

Several entities in APi Group may be involved in the recruitment process. To ensure that the Processing Purposes can be attained, your information may be shared with any APi Group Affiliate. However, it is our policy to limit the circumstances in which we share your personal information in this way to what is necessary to achieve the Processing Purposes, and to limit the categories of individual who have access to that personal information.

We share your personal information with APi Group Affiliates and third parties for the Processing Purposes as follows:

- **APi Group Affiliates.** We may transfer personal information to, or otherwise allow access to such data by other APi Group Affiliates, which may use, transfer, and process the data as necessary for the following purposes: to maintain and improve effective administration of the workforce; to maintain a corporate directory; to communicate information about the business; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable

laws; and to respond to requests and legal demands from regulators and other authorities, including authorities in the United States.

- **Communication with third parties.** As necessary in connection with business operations, work contact details and communication contact details may be transferred to existing or potential business partners, suppliers, customers, end-customers or government officials and other third parties.
- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors), insurance providers, pensions and benefits providers, and internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Acquiring entities.** In the event that any API Group company is sold or transferred in whole or in part, your personal information may be transferred to the new company or potential new company as part of the transfer itself or as part of an initial review for such transfer (i.e. due diligence), subject to any rights provided by applicable law, including jurisdictions where the new company or potential new company are located.
- **Data processors.** As necessary for the Processing Purposes described above, personal information may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, audit, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

As you may have noticed, some of the recipients we may share personal information with may be located in countries outside of the EEA.

For transfers from the European Economic Area ("EEA") to API Group Affiliates outside of the EEA, we implement the EU Standard Data Protection Clauses (pursuant to Article 46(2)(c) GDPR), which the European Commission has assessed as providing an adequate level of protection for personal information, to ensure that your data is protected adequately. UK employing companies implement the applicable standard data protection clauses for the UK.

If recipients are located in other countries without adequate protections for personal information, we will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as substantive clauses that are similar to the EU Standard Data Protection Clauses. You can ask for a copy of such appropriate safeguards by contacting us as set out in below ("Who can I contact if I have questions?").

How long will API Group keep my personal information?

Your personal information will not be kept in a form that allows you to be identified for any longer than is reasonably considered necessary by us for achieving the purposes for which it was collected or processed or as it is established in the applicable laws related to data retention periods.

What rights do I have in respect of my personal information?

To the extent specifically required by applicable law, we honor the following types of data subject rights depending on where you reside:personal information

(i) Right to be informed

Both when we collect personal information directly from you, and when we collect it from third parties, you may have the right to be informed about how we collect and use your information. This privacy notice is how we inform you about our processing of your personal information.

(ii) Right of access

You may have the right to confirm with us whether your personal information is processed, and if it is, to request access to that personal information including the categories of personal information processed, the purpose of the processing, and the recipients or categories of recipients. We do have to take into account the interests of others though, and there may also be personal information that is exempt from disclosure, so this is not an absolute right.

(iii) Right to rectification

You may have the right to rectify inaccurate or incomplete personal information concerning you. We encourage you to review this information regularly to ensure that it is accurate and up to date.

(iv) Right to erasure (right to be forgotten)

You may have the right to ask us to erase personal information concerning you in certain circumstances.

(v) Right to restriction of processing

In limited circumstances, you may have the right to request that we restrict processing of your personal information; however, where we process your personal information for the Processing Purposes we think that we have a legitimate interest in processing that data which may override a request that you make.

(vi) Right to data portability

You may have the right to receive personal information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

(vii) Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information, including profiling, by us and we can be required to no longer process your personal information. This may include requesting human intervention in relation to an automated decision so that you



can express your view and to contest the decision.

To exercise any of these rights, please contact us as stated below (see "Who can I contact if I have questions?").

You may also have the right to lodge a complaint with your competent data protection supervisory authority. Please contact us if you would like to be directed to the authority applicable to your location.

Changes to this Statement

We reserve the right to update this Statement at any time, and we will provide you with a new Statement when we make any updates. If we would like to use your previously collected personal information for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal information for a new or unrelated purpose. We may process your personal information without your knowledge or consent where required by applicable law or regulation.

Who can I contact if I have questions?

If you have concerns or questions regarding this Statement or if you would like to exercise your rights as a data subject, please contact us at chubb-global_ta@chubbfs.com. If you are not satisfied with the response you may contact the local Data Protection Authority.

Local Country Adaptations

Contained below are adaptations to the Statement to account for local law requirements in the below countries

| Country | Adaptation |
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| UK & Ireland | <ul style="list-style-type: none"> – For the Republic of Ireland, please note that Private Security Authority (PSA) require screening to cover: <ul style="list-style-type: none"> ○ 5 year character and other References ○ Evidence of Qualifications/Awards ○ Work Permits, Authorisations and Permissions ○ Documentation containing applicants current place of residence ○ Verification of personal documents e.g. birth certificate, driving licence, passport, service records, current security licence, work visa etc. – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ special category information such as race and ethnicity, religion (Northern Ireland ONLY); ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to record the status of protected employees, as applicable; ○ Criminal history. |
| Austria | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ special category information such as race and ethnicity, religion; ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to record the status of protected employees, as applicable; – Your national registry number/social security number is only processed for the purposes of reporting to social, tax or other public authorities, as required by law. |
| Belgium | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: |

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| | <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ special category information such as race and ethnicity; ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to record the status of protected employees, as applicable; ○ personal information relating to criminal offences is only processed to the extent necessary for the management of APi Group’s litigation pursuant to Art. 10 of the Belgian Data Protection Act of 30 July 2018.] ○ Credit check (if applicable for the position) <p>– Your national registry number/social security number is only processed for the purposes of reporting to social, tax or other public authorities, as required by law.</p> |
| France | <p>– With respect to the processing of your Sensitive Employee Data, please note that the following applies:</p> <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law, for social security purposes and in relation with the management of the safety at work; ○ information regarding work-related disabilities or health conditions is only processed for carrying out our obligations, for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ Criminal record check; ○ trade union membership is only processed to record the status of protected employees as applicable and to manage professional elections and the meetings of the employees’ representatives ○ personal information relating to criminal records is only requested to the employee to the extent necessary for specific mission linked to the employer activity and processed in compliance with the article 46 of the French law n°78-17 (Loi Informatique et Libertés) to exercise and monitor legal action as a victim, defendant or on their behalf and to execute decision rendered. <p>– Your national registry number/social security number is only processed for carrying out our obligations, for the purposes of reporting to social, tax or other public authorities, as required by law.</p> <p>– Information on religious affiliates is not requested, used or processed by the employer. Any exception to this principle could only be made in strict compliance with the cases provided for by the French Law ‘Informatique et Libertés’ and the European Regulation (GDPR).</p> <p>– Your competent data protection supervisory authority in France is the CNIL.</p> |

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| <p>Netherlands</p> | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes ○ special category information such as race and ethnicity is only processed if and when necessary for the purposes of obligations of specific rights in field of employment, social security and/or social protection law and only in so far as authorized by Dutch law ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities ○ trade union membership is only processed to record the status of protected employees, as applicable ○ personal information relating to criminal offences is only processed to the extent necessary for the management of APi Group’s litigation pursuant to Art. 10 of the Dutch Data Protection Act of 16 May 2018. ○ Credit check (if applicable for the position) – Your national registry number/social security number is only processed for the purposes of reporting to social, tax or other public authorities, as required by law. – Declaration of Conduct (Verklaring Omtrent Gedrag in Dutch) A or B depending on the position/job title. |
| <p>Germany</p> | <p>Purposes and legal basis of data processing</p> <ul style="list-style-type: none"> – We process your personal information in compliance with the provisions of the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and all other relevant laws (e.g. ArbZG, etc.) as amended. First and foremost, data processing serves to establish, implement and terminate the employment relationship. The primary legal bases for this in Germany are § 26 BDSG and Art. 6 (1) lit. b GDPR. <p>For Employees in Germany who are seeking application to another position within the APi Group: Employees in Germany also have the option of submitting a complaint to the above-mentioned data protection officer or to a data protection supervisory authority. The data protection supervisory authority responsible for us is:</p> <p>The Hamburg Commissioner for Data Protection and Freedom of Information.</p> <p>Ludwig-Erhard-Str 22, 7th floor</p> <p>20459 Hamburg</p> <p>Tel.: 040 / 428 54 - 4040</p> <p>Fax: 040 / 428 54 - 4000</p> <p>E-mail: mailbox@datenschutz.hamburg.de</p> <p>Data privacy officer (Datenschutzbeauftragte)</p> |

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| | <p>Ms. Pia Peltzer. exkulpa gmbh Waldfeuchter Str. 266 52525 Heinsberg Tel.: 02454/993311 datenschutz@chubb.de peltzer@exkulpa.de</p> <p>Ms. Peltzer can be reached at the above address and is available to answer any questions our employees may have regarding data protection. As an employee, you have the right to contact our data protection officer anonymously regarding data protection issues.</p> |
| Spain | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ special category information such as race and ethnicity, religion; ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to record the status of protected employees, as applicable; |
| Sweden | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health and medical data (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ information regarding work-related disabilities or health conditions is only processed to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to comply with our obligation to consult your union when required under Swedish Co-determination Act (Sw. <i>medbestämmandelagen</i>); ○ personal information relating to criminal offences is only processed to the extent necessary and permitted within a whistleblowing scheme in accordance with Swedish Whistleblowing Act (Sw. <i>lag om skydd för personer som rapporterar om missförhållanden</i>). ○ <u>Race or ethnicity data, information on religious affiliates or sexual life data is not processed.</u> |

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| | <ul style="list-style-type: none"> - Your competent data protection supervisory authority in Sweden is the Swedish Authority for Privacy Protection (Sw. <i>Integritetsskyddsmyndigheten</i>). |
| Switzerland | <ul style="list-style-type: none"> - With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> o health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; o special category information such as race and ethnicity, religion; o information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; o trade union membership is only processed to record the status of protected employees, as applicable; |
| Australia and New Zealand | <p>With respect to the processing of your Sensitive Employee Data, please note that the following applies:</p> <ul style="list-style-type: none"> o National Police Check o Pre-employment medical – link to position Field or Office Staff o Vevo Check – immigration and working rights in Australia. o Financial check (credit history) only carried out for Senior Finance roles. o Nationality: only to check work permits o Trade Union Membership, so we can pay the fees and make deductions accordingly. o Disability only if employee self-disclose, or accommodations are needed. o Criminal History o Drug Screen Results o <u>Race or ethnicity data, information on religious affiliates or sexual life data is not processed.</u> |
| Singapore | <p>With respect to the processing of your Sensitive Employee Data, please note that the following applies:</p> <ul style="list-style-type: none"> o health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes. We collect proof of Covid Vaccination Certificate; o special category information such as race and ethnicity is only processed if and when necessary for the purposes of obligations of specific rights in field of employment, social security and/or social protection law and only in so far as authorized by Dutch law |

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| | <ul style="list-style-type: none"> ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities |
| China | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ special category information such as race and ethnicity, religion; ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to record the status of protected employees, as applicable; – Your national registry number/social security number is only processed for the purposes of reporting to social, tax or other public authorities, as required by law. |
| Macau | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ special category information such as race and ethnicity, religion; ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to record the status of protected employees, as applicable; |
| India | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; |
| Dubai | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ special category information such as race and ethnicity, religion; |

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| | <ul style="list-style-type: none"> ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; ○ trade union membership is only processed to record the status of protected employees, as applicable; |
| Canada | <ul style="list-style-type: none"> – With respect to the processing of your Sensitive Employee Data, please note that the following applies: <ul style="list-style-type: none"> ○ health-related information (such as your days of absence for medical reasons, information on work-related accidents, information on maternity leave) is only processed for carrying out our obligations and specific rights in the field of employment law and for social security purposes; ○ special category information such as race and ethnicity, religion; ○ information regarding work-related disabilities or health conditions is only processed for benefits administration purposes and to provide necessary accommodations for any work-related disabilities; – Your national registry number/social security number is only processed for the purposes of reporting to social, tax or other public authorities, as required by law. |