



APPLICANT PRIVACY NOTICE

The Enstar Group of Companies controlled by Enstar Group Limited ("Enstar", "we", "us" "the Company" or "our") is committed to protecting the privacy of applicants for employment with Enstar. We will ensure that the information you submit to us, or which we collect, via various channels, through written correspondence (including e-mail), through intermediaries such as recruitment agencies, or through any of our offices globally, is only used for the purposes set out in this notice.

Through this Applicant Privacy Notice ("this Notice"), we aim to inform you about the types of personal data we collect from you and/or intermediaries, the purposes for which we use the data, and the ways in which the data is handled. We also aim to satisfy the obligation of local laws relevant to our offices' locations. A separate Employee Privacy Notice covers data provided to Enstar should you become employed by Enstar. For the purpose of this Notice, the Data Controller of personal data is Enstar, and our contact details are set out in the 'Contact Us' section at the end of this Notice. The Company has office locations in Australia, Bermuda, Continental Europe, the United Kingdom, and the USA.

The Company collects and processes personal data relating to potential employees to enable Enstar to consider your application and suitability for a role with the Company. The Company is committed to being transparent about how it collects and uses that data, and to meeting its data protection obligations. We will never rent or sell your data or share your data unnecessarily.

What information does Enstar collect?

Enstar collects and processes a range of information about you. This includes:

- Identifier and records information such as your name, address, and contact details such as email, telephone number, and date of birth
- The terms and conditions of your previous/existing employment
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and any other information you chose to supply us on your CV or during the application process
- Information about your remuneration with current/previous employers, including entitlement to benefits such as pensions or insurance cover
- Information about your marital status, next of kin, dependants and emergency contacts
- Information about your nationality and entitlement to work in your respective location
- Background checks that may contain information about criminal records should that be relevant
- Information about medical or health conditions, including whether or not you have a disability for which Enstar would need to make reasonable adjustments
- CCTV footage captured while safeguarding people and property
- Biometric data such as facial images that may have been supplied in online profiles
- With your prior permission, we may also collect equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The Company collects this information in a variety of ways. For example, data is collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from correspondence with you; or through interviews, meetings or other assessments.

Applicant Privacy Notice (Continued)

In some cases, Enstar collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

Data is stored in the Company's HR management systems, and in other IT systems (including the Company's e-mail system). Access is restricted to those with a need to view the information, such as for assessing applications and conducting interviews.

Why does Enstar process personal data?

Enstar needs to process data to assess your suitability for employment with Enstar.

In some cases, Enstar needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an applicant's entitlement to work in that country.

In other cases, Enstar has a legitimate interest in processing personal data. Where Enstar relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of you as a candidate and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations, such as those in relation to candidates and employees with disabilities and for health and safety purposes.

Where Enstar processes other special categories of personal data, such as information about ethnic origin, sexual orientation, religion or belief, this is done for the purposes of equal opportunities monitoring. Data that Enstar uses for these purposes is anonymised or is collected with the express consent of candidates, which can be withdrawn at any time. Candidates are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

Purpose

The Company will only use your personal data for the purpose for which it was collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will advise you of this and explain the legal basis which allows us to do so.

Some of the purposes are:

- Handling your job application and as part of the hiring process, Enstar will process your personal data from application documents submitted. Our legal grounds for processing your personal data would be for the performance of a contract or the pre-contractual measures at your request
- Conducting background checks on you
- Obtaining employment references
- Retaining your personal data to consider for future job openings. In such instances, Enstar would obtain your consent for keeping your data. We may also retain the right in certain circumstances to keep your personal data on file, where we may need this data for the establishment, exercise or defence of legal claims against us. In such instances, we would rely on legitimate interest legal grounds for such continued retention.

You should be aware that we may process your personal data without your knowledge or consent where this is required or permitted by law.

Who has access to data?

Your information will be shared internally, including with members of the HR and recruitment team (including payroll), individuals conducting interviews and otherwise involved in reviewing your application, your proposed line manager, managers in the business area in which you are intending to work, and IT staff if access to the data is necessary for performance of their roles.



Applicant Privacy Notice (Continued)

Enstar shares your data with third parties to obtain pre-employment references from other employers, obtain employment background and qualification checks from third-party providers and obtain necessary criminal records checks.

As a global business, your data may be transferred to companies in our Group on a need-to-know basis. When Personal Data for residents of the UK or EEA is transferred outside the UK or EEA, it will be on the basis of a declaration of adequacy or relevant safeguards being in place, such as EU Model Clauses or an International Data Transfer agreement.

How does Enstar protect data?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to endeavour to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by authorized employees in the performance of their duties.

Where Enstar engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does Enstar keep your data?

If your application is successful and you commence employment with Enstar, the Company will hold your personal data in corporate HR systems for the duration of your employment and for seven years afterwards. Paper and digital records will be reviewed annually and records for people who exited the company more than seven years prior will be securely destroyed. The periods for which your data is held after the end of employment maybe be subject to local statutory variations.

If your application is unsuccessful, your information will be retained no later than the end of the year following your application, at which time it will be securely destroyed. This information is retained for the purposes of evidencing your application and the recruitment process undertaken. With your permission, your information may be retained to consider your suitability for future job openings.

What if you do not provide personal data?

Certain information, such as contact details, your right to work in your country and payment details, need to be provided to enable Enstar to enter into a contract of employment with you. If you do not provide information requested, this may prevent the Company's ability to establish an employment relationship with you.

Automated decision-making

Employment decisions are not based solely on automated decision-making.

Your rights

As a data subject who has provided information to Enstar, you have a number of rights. You can:

- Access and obtain a copy of your data on request (known as a "data subject access request")
- Require the Company to change incorrect or incomplete data
- Request erasure of your personal information. This enables you to ask the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing your application for employment
- Object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing
- Ask the Company to suspend the processing of your personal data for a period if data is inaccurate or there is a dispute about its accuracy or the reason for processing it

Applicant Privacy Notice (Continued)

If you would like to exercise any of these rights, please contact our Data Protection Officer at dpo@enstargroup.com. You also have the right not to be discriminated against for submitting a data subject request.

If you believe that Enstar has not complied with your data protection rights, you can contact our Chief People Officer; our Data Protection Officer dpo@enstargroup.com; or you can complain to your local data privacy authority.

Further Information on Data Protection and Personal Privacy

If you have any enquiries, or if you would like to contact us about our processing of your personal information, including to exercise your rights as outlined above, please contact using the details in the Contact Us Section below.

Contact Us

When you contact us, we may ask you to verify your identity, particularly if you are submitting a data subject rights request.

Email: dpo@enstargroup.com

Last Review date: March 7, 2024

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of local data protection laws and group standards.