# JLL Employee / Job Applicant Privacy Statement: How JLL collects and uses personal information about its employees and job applicants.

This Privacy Statement says how JLL Incorporated (including all its wholly-owned subsidiaries, "Jones Lang LaSalle," or "Company") collects and uses personal information – in both electronic and hard copy - about its employees and job applicants.

### If we change this Privacy Statement:

JLL might update this Privacy Statement from time to time. When we have to do this, we will notify you of any significant changes to the way we treat your personal information. We will send a notice to your email address or will put a notice on the JLL Intranet.

## Our legal basis for collecting and using personal information about employees or candidates:

Nearly all the processing of your personal information undertaken by JLL will be necessary for the purposes of recruitment and carrying out JLL's obligations in the field of employment. Where 'special category' personal data is collected, e.g. information about health or ethnicity, this will be done on the basis of consent unless the law allows, or requires, us to do so for a specific legal purpose – for diversity monitoring, for example.

### Additional reasons for processing personal information:

You should be aware that we may process your personal information for additional purposes. Normally our legal basis for doing so will be that the processing is in our "legitimate interests".

We may process, for example:

- CCTV images of persons using the work place,
- entry and exit times to our buildings,
- employee location information, and
- tracking data of JLL vehicles used by employees.

We use this information to prevent crime, for employee safety, for client servicing or to protect JLL assets.

#### Who might we share your personal information with?

Recipients could include:

- HR staff,
- · recruitment agencies and assessment centre providers,
- referencing and screening organisations,
- outsourced providers (e.g. payroll),
- insurers or benefits providers (e.g. pensions),
- professional advisors (e.g. lawyers, accountants),
- external training providers (e.g. for professional qualifications or soft skills),
- technology providers (e.g. to run our business),
- prospective clients (e.g. limited personal information in proposals and business promotions),

- managers and staff connected with your work,
- other companies in our group,
- regulators and other professional bodies (e.g. RICS),
- any recipient exercising powers to demand personal information e.g. government and public authorities for tax, social security authorities for benefits, courts, and law enforcement bodies such as the police when required by law to disclose, or
- any recipient who you give us consent to provide personal information to.

#### How we protect your personal information if we send it to other countries

Due to the global nature of JLL's business, we may transfer personal information between organisations and across national boundaries. For example, some of our systems store and transport data across regions. Staff reporting and recruitment can also cross national boundaries, requiring your information to be transferred. Some of the work you do may necessitate your personal information crossing national boundaries. When we do this, JLL Group entities and third parties make appropriate safeguards for the transfer (such as using the standard contractual clauses approved by the European Union or the EU-US Privacy Shield scheme) and will comply with all laws and regulations that apply to us. Our practices will be consistent with the JLL Code of Business Ethics and the Privacy Commitment.

### How long do we keep your personal information?

JLL retains your personal information for as long as required for statutory or business reasons.

## Your rights to your personal information:

You have the right of access to personal information held by JLL. You also have the right to have your personal information corrected if it is wrong or erased in limited circumstances. Where JLL makes use of automated decision-making you can request details of this. For more information about your rights please contact <a href="mailto:PrivacyEnquiries@jll.com">PrivacyEnquiries@jll.com</a>. There is no charge for us providing this information to you. You can also ask for personal information that you have provided to us in a machine-readable format, so you can transfer it to another organization if you want to.

#### The right to withdraw consent at any time, where appropriate:

If we collect and use personal information about you on the basis of your consent, then we will cease to process this if consent is withdrawn, except where there is an alternative legal basis to continue processing your personal information.

#### **Sources of personal information**

JLL may obtain personal information relevant to your employment from sources such as:

- recruitment agencies,
- the internet/databases/research tools (e.g. professional membership, WorldCheck, Experian),
- training providers (e.g. where we sponsor a qualification),
- financial institutions (e.g. for a P-Card),
- telecoms providers (e.g. billing, call history),
- other JLL group entities,
- JLL employees.
- employment referees,
- government agencies e.g. for tax reasons,
- health providers e.g. for occupational health reasons,
- where applicable a Disclosure and Barring Service, or
- social media.

## At a minimum we will hold the following personal information

- your first and last name,
- date of birth,
- home address,
- home telephone number or any other contact number you provide,
- your e-mail address,
- right to work and immigration status,
- employment history,
- personal or employment references,
- education and experience information,
- social security/national identity number,
- family member details for purposes of health insurance, benefits, emergencies,
- bank account details, and
- any other employment information you provide to us

## Additional personal information could include (depending on role and location):

- pay-related details,
- health and safety (e.g. disability),
- copies of IM / emails / social media activity,
- our training records,
- staff photographs,
- complaint details,
- biometric data (e.g. for data center or building access),
- performance details, or
- 'opinion' information (e.g. in Yammer or surveys),
- location tracking data (e.g. to improve safety of lone workers).

## If you do not provide personal information

If you do not provide personal information necessary for an employment contract or to meet with a statutory requirement, it will likely result in the failure of your application for employment. Note that JLL has no statutory power to require you to provide information, but this could become a contractual requirement for our employees. Where personal information is not provided in the course of your work with us it may not be possible to provide you with essential business support such as IT services.

In some jurisdictions; JLL will require consent to process your personal information as an employee or a job applicant, by reading this statement/proceeding with the recruitment procedure you agree to your personal information being processed by JLL.

#### How to complain

If you need to make a complaint about our handling of your personal information, please contact your HR Manager. If you are unhappy with how we deal with your complaint, you can contact your <u>national data protection regulator.</u>

#### How else to contact us

If you have any other questions about your personal information please contact us by email at <a href="mailto:PrivacyEnquiries@jll.com">PrivacyEnquiries@jll.com</a>, or write to your local HR Function.

For any HR query **not** relating to your personal information; please contact your local HR team.