

Candidate Privacy Notice

1. INTRODUCTION

- 1.1 Lindamood Bell Learning Processes (Lindamood-Bell) and our associated companies ("Company", "we", "us" and "our") hold and process data on all candidates, applicants, interview candidates and third parties whose information you provide to us in connection with your application (e.g. referees) ("**candidates**" or "**you**" or "**your**").
- 1.2 The Company, Lindamood-Bell, will be the data controller of your personal data. This Privacy Notice is provided on behalf of the Company. Contact us at 416 Higuera Street, San Luis Obispo, California, 93401, United States, by email at privacy@lindamoodbell.com, and/or by phone 1-805-546-5693. Contact details are available at <https://lindamoodbell.com/gdpr>. We take your data protection rights and our legal obligations seriously. Your personal data will be treated in a secure and confidential manner and only as set out below or otherwise notified to you in writing.
- 1.3 This Privacy Notice describes the categories of personal data we collect, how your personal data is processed, for what purposes we process your data and how your privacy is safeguarded in the course of your application to us. It is intended to comply with our obligations to provide you with information about our processing of your personal data under privacy laws. It does not have any contractual weight.
- 1.4 If you have any questions about this Privacy Notice or would like to access the information it contains in a different format please contact Lindamood-Bell's data protection lead at privacy@lindamoodbell.com or Human Resources at support.hr@lindamoodbell.com. Full contact details are available at <https://lindamoodbell.com/gdpr>.
- 1.5 If you have any questions regarding the processing of your personal data or if you believe your privacy rights have been violated, or if you are aware of an unauthorised use or disclosure of data please contact Lindamood-Bell's data protection lead at privacy@lindamoodbell.com or Human Resources at support.hr@lindamoodbell.com. Full contact details are available at <https://lindamoodbell.com/gdpr>.

2. WHAT DATA DO WE PROCESS?

- 2.1 Personal data means any information describing or relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- 2.2 We collect various types of personal data about you for the purposes described in this Privacy Notice including:
 - 2.2.1 **Personal details:** your name, nationality, personal contact details (eg address, telephone or mobile number, e-mail), national ID number, immigration and eligibility to work information, driving licence, languages spoken, details of any disability and any reasonable adjustments required as a result;

- 2.2.2 **Recruitment and selection data:** skills and experience, qualifications, references, CV and application, interview and assessment data, vetting and verification information (eg a basic disclosure criminal record check relating to unspent convictions where carried out and permitted by applicable law), right to work verification, information related to the outcome of your application, details of any offer made to you;
 - 2.2.3 **Monitoring data (to the extent permitted by applicable laws):** building login and access records, call or meeting recordings, data caught by IT security programmes and filters;
 - 2.2.4 **Equality and diversity data:** where permitted by law and provided voluntarily, data regarding gender, age, race, nationality, (stored anonymously for equal opportunities monitoring purposes);
 - 2.2.5 Any other personal data which you choose to disclose to us during the course of your application, whether verbally or in written form (for example in emails);
- 2.3 Apart from personal data relating to you, you also provide the Company with personal data of third parties, notably any referees or next of kin contact information, for the purposes described in this Privacy Notice. Before you provide such third party personal data to the Company you must first inform these third parties of any such data which you intend to provide to the Company and of the processing to be carried out by the Company, as detailed in this Privacy Notice.
- 2.4 Certain additional information may be collected where this is necessary and permitted by local applicable laws.

3. SPECIAL CATEGORIES OF DATA

- 3.1 To the extent permitted by applicable laws the Company collects and processes a limited amount of personal data within the above data listed at 2.1 falling into special categories, sometimes called "sensitive personal data". This term means information relating to:
 - 3.1.1 physical or mental health (including details of accommodations or adjustments);
 - and
 - 3.1.2 criminal records and information regarding criminal offences or proceedings.

4. HOW DOES THE COMPANY COLLECT DATA?

- 4.1 The Company mainly collects and records your personal data from you. You will provide this information directly to the hiring manager or relevant recruiter or enter it into our systems (for example, through your self-service access to Silkroad Recruiting via the Lindamood-Bell Career Site, our participation in the recruitment process, emails you send or through verbal information which is recorded electronically or manually. In addition, further information about you will be generated by the relevant recruiter, hiring manager or other employees of Lindamood-Bell involved in the recruitment process.
- 4.2 If you applied to the advertised role through a recruitment agency, we will have received your application and associated personal information from this recruitment agency.

- 4.3 We also obtain some information from third parties such as uCheck and Accurate Background: for example, where we employ a third party to carry out a background check (where permitted by applicable law).
- 4.4 In some circumstances, data is collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, telephone logs and recordings, and email), if and to the extent permitted by applicable laws. In these circumstances, the data may be collected by the Company or a third party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible.
- 4.5 In the event that particular information is required by contract or statute this will be indicated at the time of collection. We will also let you know where there are consequences of you not providing the information requested. Failure to provide some information will mean that we cannot carry on with the recruitment process. For example, if you do not provide us with your name or background, we will not be able to consider you for employment. In some cases it may mean that we are unable engage further with you as the Company will not have the personal data we believe to be necessary to reach a recruitment decision.

5. WHAT ARE THE PURPOSES FOR WHICH DATA IS PROCESSED AND WHAT IS OUR LEGAL BASIS FOR CARRYING OUT THE PROCESSING?

- 5.1 Your personal data are collected and processed for various business purposes, in accordance with applicable laws and any applicable collective bargaining agreements. We have set out in this Privacy Notice the purposes we may use your personal data for. Data may occasionally be used for purposes not obvious to you where the circumstances warrant such use. We may, where we think it is necessary, provide you with additional information during the recruitment process to ensure that you understand how your personal data may be used.

5.2 The legal basis on which we process your personal data

- 5.2.1 Whenever the Company processes your personal data we do so on the basis of a legal basis or justification for that processing. Processing of special categories of data is always justified on the basis of an additional lawful condition. In the majority of cases, the processing of your personal data will be justified on one of the following basis:
- 5.2.1.1 The processing is necessary for compliance with a legal obligation to which the Company is subject; or
 - 5.2.1.2 Where there is no legal obligation we will process your data where the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract;
 - 5.2.1.3 Where the above two grounds do not apply we may process your personal data where the processing is necessary for the legitimate interests pursued by the Company, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.
- 5.2.2 We may on occasion process your personal data for the purpose of legitimate interests pursued by a third party, except where such interests are overridden by

your interests or fundamental rights and freedoms which require protection of personal data (for example to meet the security requirements of our clients).

5.2.3 In exceptional circumstances we may carry out the processing on the basis of your consent (for example if you ask us to provide pay information to a bank for a mortgage application made by you). Where we rely on consent we will make this clear at the time.

5.2.4 We have set out below the purposes we may use your personal data for and the legal basis we rely on in each case.

5.3 The purposes we use personal data for and the legal basis that applies

We have identified a number of purposes for collecting and processing your personal data. These are set out below together with the legal basis we rely on in each case:

No.	Purpose for processing	The lawful basis we rely on
a)	<p>Recruitment and selection</p> <p>Considering your suitability to work for us in the role you have applied for, comparing you to other candidates and making recruitment decisions</p>	<p>Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including anti-discrimination laws and the requirement to make reasonable adjustments or accommodations where appropriate in the event that you choose to disclose that you have a disability.</p> <p>Some of this processing is necessary for taking steps at your request to enter into a contract with you.</p> <p>Additional processing is necessary for the purpose of the legitimate interests pursued by the Company.</p> <p>The Company has a legitimate interest in fully assessing applicants to ensure that only suitable and appropriate candidates are selected, to compare candidates and make a fair decision on the most appropriate candidate for the position.</p> <p>The Company aims to recruit the best person for each vacancy through fair, systematic, effective recruitment and selection procedures. This will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre employees.</p>
b)	<p>Pre-employment verification and screening</p> <p>Appropriate pre-employment screening including, where relevant and appropriate, criminal record checks (if and to the extent permitted by applicable</p>	<p>Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including establishment of the right to work in the country in which you are employed.</p> <p>According to www.gov.uk/find-out-dbs-check, Lindamood-Bell is authorised to check an employee's criminal record because the individual is working with children (under 18) more than three times a month. This processing is carried out on the basis of substantial public interests.</p>

	<p>laws), right to work, relevant employment history, relevant regulatory status and relevant professional and educational qualifications.</p>	<p>Screening which is not legally required is necessary for the purpose of the legitimate interests pursued by the Company.</p> <p>The Company has a legitimate interest in ensuring that candidates for employment or engagement do not pose an unacceptable risk to the business or its clients and considers the verification carried out necessary to prevent crime and other unlawful acts and to protect the business and clients from fraud, dishonesty or incompetence.</p>
c)	<p>Offers of employment and on-boarding</p> <p>Making job offers, providing contracts of employment or engagement and preparing to commence your employment or engagement where you accept an offer from us</p>	<p>Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including the requirement to issue written particulars or terms of employment and the requirement not to unlawfully discriminate in the terms of any offer to you.</p> <p>Additional processing is necessary to take steps to enter into the contract between you and the Company and to perform that contract because we will need information to make an appropriate offer to you and administer your employment contract if you join us.</p> <p>The remainder of the processing is necessary for the purpose of the legitimate interests pursued by the Company.</p> <p>The Company has a legitimate interest in ensuring the effective engagement of candidates on appropriate terms and conditions of employment and that there is a smooth transition into employment for successful candidates and that information supplied in the recruitment process which is relevant to ongoing employment is maintained. This will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre employees.</p>
d)	<p>Future job opportunities</p> <p>To contact you if you are not successful in your initial application should another potentially suitable vacancy arise during the six months following completion of the recruitment process for the role you originally applied for</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company.</p> <p>The Company has a legitimate interest in maintaining an appropriate pool of talent who have shown an interest in working for the Company and who are potentially suitable candidates for employment. This will potentially benefit both initially unsuccessful candidates and the Company. It will contribute towards the Company continuing to meet its business objectives, maintain its reputation and attract high calibre employees.</p>
e)	<p>Recruitment feedback and complaints</p> <p>To deal with any query,</p>	<p>This processing is necessary for the compliance with legal obligations to which the Company is subject including ensuring that the Company is able to demonstrate its</p>

	challenge or request for feedback received in relation to our recruitment decisions	<p>compliance with data protection laws and anti-discrimination laws</p> <p>Beyond legal compliance processing is necessary for the purpose of the legitimate interests pursued by the Company.</p> <p>The Company has a legitimate interest in being able to provide feedback to candidates and to be able to defend any challenge or claim made in connection with our recruitment decision. This will assist the Company to avoid the risk of financial exposure or costs incurred through challenges to recruitment decisions and to maintain its reputation.</p>
f)	<p>Ensuring equality of opportunity</p> <p>Monitoring programmes to ensure equality of opportunity and diversity with regard to personal characteristics protected under applicable anti-discrimination laws</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company.</p> <p>The Company has a legitimate interest in ensuring equality of opportunity or treatment between people of different [age, sex, racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation].</p> <p>Ensuring equality and diversity ensures attraction and retention of high calibre employees, protects the Company's reputation, avoids unlawful discrimination and supports the Company in achieving its long-term business goals and outcomes.</p> <p>The Company processes this information on the basis of substantial public interest.</p>
g)	<p>Complaints, claims and litigation</p> <p>To enforce our legal rights and obligations, and for any purposes in connection with any complaint or legal claim made by, against or otherwise involving you</p>	<p>This processing is necessary for the purpose of the legitimate interests pursued by the Company.</p> <p>The Company has a legitimate interest in protecting its organisation from breaches of legal obligations owed to it and defending itself against litigation. This is needed to ensure that the Company's legal rights and interests are protected appropriately, to protect the Company's reputation and to protect the Company from other damage or loss.</p> <p>This is important to protect the business of the Company and ensure its continued success and growth. This supports the Company's immediate and long-term business goals and outcomes.</p>

5.4 Additional legal basis we rely on where we process special category data

The special categories of personal data that are processed by the Company are set out above. Where we process special categories of data it will be justified by a condition set out at 5.2.1 above and also by one of the following additional conditions:

- 5.4.1 The processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws;
- 5.4.2 The processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
- 5.4.3 The processing is necessary to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency);
- 5.4.4 The processing is necessary for purposes authorised by applicable law. This includes those purposes set out in Schedule 1 of the Data Protection Act 2018:
 - 5.4.4.1 ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted or maintained;
 - 5.4.4.2 The processing is necessary for the prevention or detection of unlawful acts where it must be carried out without consent so as not to prejudice those purposes;
 - 5.4.4.3 The processing is necessary for making a determination in connection with eligibility for benefits payable under an occupational pension scheme;
- 5.4.5 The processing is necessary for the establishment, exercise or defence of legal claims; or
- 5.4.6 In exceptional circumstances the processing is carried out subject to your explicit consent (as explained below).

5.5 The purposes we use special category personal data for and the additional legal basis that applies

We have identified a number of purposes for collecting and processing your special category personal data. These are set out below together with the additional legal basis we rely on in each case:

No.	Purpose for processing	Additional lawful basis for special category data processing
a)	Health and medical information may be used to comply with employment, health and safety or social security laws. For example, to carry out statutory risk	This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws. In particular those laws set out in this section.

	assessments and regular health and safety assessments, provide statutory incapacity or maternity benefits, avoid breaching legal duties to you, to ensure fair and lawful management of your employment, avoid unlawful termination of your employment, to administer the Company's private medical and long term disability schemes, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard.	To the extent that this data is managed by our occupational health advisers, this processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws.
b)	Special category personal data of any type may be used in the event of a complaint, claim or litigation or potential claim or litigation by, against or involving you.	This processing is necessary to establish, exercise or defend legal claims.

5.6 We may seek your consent to certain processing which is not otherwise justified under one of the above basis. If consent is required for the processing in question, it will be sought from you separately to ensure that it is freely given, informed and explicit. Information regarding such processing will be provided to you at the time that consent is requested, along with the impact of not providing any such consent. You should be aware that it is not a condition or requirement of your employment to agree to any request for consent from the Company.

5.7 Processing data relating to criminal convictions and offences

Personal data relating to criminal convictions and offences will only be processed where authorised by applicable laws. For example:

5.7.1 a criminal record check may be carried out on recruitment or transfer or intermittently where ongoing screening is required where authorised by applicable laws; or

5.7.2 an allegation of a criminal offence or conviction arising during your relationship with the Company may be processed where required or authorised by applicable law. For example:

5.7.2.1 where we have a legal or regulatory requirement to report an offence;
or

5.7.2.2 where applicable laws authorise the Company to process information about the offence (e.g. in a disciplinary process) for the purpose of making decisions regarding your relationship with the Company.

6. RETENTION OF PERSONAL DATA

- 6.1 The Company endeavours to ensure that personal data are kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable.
- 6.2 We generally retain personal data for as long as is required to satisfy the purpose for which it was collected. In the case of recruitment documentation, this is usually six months.
- 6.3 Should other retention periods apply, this will usually be the length of the relevant recruitment exercise plus the length of any applicable statutory limitation period following this, although some data may need to be kept for longer. We may keep some specific types of data for different periods of time, as required by applicable law. Some personal data may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.
- 6.4 The Company endeavours to ensure that personal data are kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable. However, some personal data may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

We will generally retain your personal data only so long as it is required for purposes for which it was collected. This will usually be the period of your employment/contract with us plus the length of any applicable statutory limitation period following your departure, although some data, such as pension information, may need to be kept for longer. We may keep some specific types of data, for example, tax records, for different periods of time, as required by applicable law.

Physical HR files are retained for 6 years from the termination date and then securely destroyed unless legal and regulatory obligations require the files be retained beyond this period.

Digital files are retained for 6 years from the termination date and then erased in a secure way that protects the employee's personal information unless legal and regulatory obligations require the digital files be retained beyond this period.

All resumes and screening results for those people not hired, must be kept on-site for 6 months and stored in a confidential place. After 6 months, the screening results are destroyed in a way that protects the applicant's personal information.

All applicant data is erased after 6 months if the candidate is not successful in hiring.

Electronic form submission responses will be erased after 1 year.

Emails are kept in Google Vault for 10 years.

7. DISCLOSURES OF PERSONAL DATA

- 7.1 Within the Company, your personal data can be accessed by or may be disclosed internally on a need-to-know basis to:
- 7.1.1 Global Human Resources and recruiters, including managers and team members;
 - 7.1.2 Local, regional and executive management responsible for managing or making decisions in connection with your application to the Company (including, without limitation, staff from Human Resources, Center Operations, and the Learning Center Division;
 - 7.1.3 system administrators; and
 - 7.1.4 where necessary for the performance of specific tasks or system maintenance by candidates in the Company teams such as the Accounting and IT Department and the Global HR information systems support team.
- 7.2 Your personal data is also accessed by third parties whom we work together with (including without limitation, Silkroad Recruiting, and their associated companies and sub-contractors) for providing us with services, such as hosting, supporting and maintaining the framework of our information systems.
- 7.3 Examples of third parties with whom your data will be shared include regulatory authorities, the Company's insurers, bankers, IT administrators, lawyers, auditors, investors, payroll providers, and administrators of the Company's benefits programs. The Company expects such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security.
- 7.4 Where these third parties act as a "data processor" (for example a payroll provider) they carry out their tasks on our behalf and upon our instructions for the above mentioned purposes. In this case your personal data will only be disclosed to these parties to the extent necessary to provide the required services.
- 7.5 In addition, we may share personal data with national authorities in order to comply with a legal obligation to which we are subject. This is for example the case in the framework of imminent or pending legal proceedings or a statutory audit.

8. SECURITY OF DATA

- 8.1 The Company is committed to protecting the security of the personal data you share with us. The Company uses a variety of technical and organisational methods to secure your personal data in accordance with applicable laws.

9. INTERNATIONAL TRANSFER OF PERSONAL DATA

- 9.1 From time to time your personal data (including special categories of personal data) will be transferred to associated companies of the Company to process for the purposes described in this Privacy Notice. This will be applicable for example where the relevant company or a manager from that company is responsible for conducting or approving the relevant process or the data is part of a global directory where other individuals need to have access.

- 9.2 Some of these associated companies or managers are located outside the United Kingdom and European Union (for example Lindamood-Bell's corporate office in the USA at 416 Higuera Street, San Luis Obispo, California, 93401, USA).
- 9.3 Personal data will also be transferred to third parties (e.g. service providers or regulators as set out above), who may have systems or suppliers located outside the United Kingdom and European Union.
- 9.4 As a result, your personal data may be transferred to countries outside of the country in which you work or outside of the United Kingdom and European Union to countries whose data protection laws may be less stringent than ours.
- 9.5 The Company will ensure that appropriate or suitable safeguards are in place to protect your personal information and that transfer of your personal information is in compliance with applicable data protection laws.
- 9.6 Where required by applicable data protection laws, the Company has ensured that service providers (including our associated companies) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant Company exporter. You can obtain a copy of any standard contractual clauses in place which relate to transfers of your personal data by contacting Human Resources by email at support.hr@lindamoodbell.com and/or by phone 1-805-546-5693.
- 9.7 The Privacy Shield regulates the Company's cross-border transfers of personal data within the Group.
- 9.8 You have a right to request a copy of any data transfer agreement under which your personal data is transferred, or to otherwise have access to the safeguards used. Any data transfer agreement made available to you may be redacted for reasons of commercial sensitivity. To request sight of these contact Human Resources by email at support.hr@lindamoodbell.com and/or by phone 1-805-546-5693.

10. YOUR RIGHTS AS A DATA SUBJECT

10.1 Right to access, correct and delete your personal data

- 10.1.1 The Company aims to ensure that all personal data are correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address and bank accounts) are notified to the Company so that we can ensure that your data is up-to-date.
- 10.1.2 You have the right to request access to any of your personal data that the Company may hold, and to request correction of any inaccurate data relating to you. You furthermore have the right to request deletion of any irrelevant data we hold about you.
- 10.1.3 You can see and update some of this data yourself via Silkroad Recruiting. However, to correct/update other information, you will need to contact your recruitment contact.

10.2 Data portability

Where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that

personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to the Company in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.

10.3 **Right to restriction of processing:**

You have the right to restrict our processing of your personal data where:

- 10.3.1 you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
- 10.3.2 where the processing is unlawful but you do not want us to erase the data;
- 10.3.3 where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- 10.3.4 where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether the Company has compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

10.4 **Right to withdraw consent**

Where we have relied on your consent to process particular information and you have provided us with your consent to process data, you have the right to withdraw such consent at any time. You can do this by (i) in some cases deleting the relevant data from the relevant applicant system (although note that in this case it may remain in back-ups and linked systems until it is deleted in accordance with our data retention policy) or (ii) contacting your local recruitment contact. It will only however be rarely that we rely on your consent to process personal data for your employment or engagement.

10.5 **Right to object to processing justified on legitimate interest grounds**

Where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

10.6 **Right to complain**

You also have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes applicable law.

- 10.7 For further information regarding your rights, or to exercise any of your rights, please contact the data protection lead at privacy@lindamoodbell.com or Human Resources at support.hr@lindamoodbell.com. Full contact details are available at <https://lindamoodbell.com/gdpr>.

11. ADDITIONAL PRIVACY NOTICES

We may undertake certain processing of personal data which are subject to additional Privacy Notices and we shall bring these to your attention where relevant.

12. NOTICE OF CHANGES

- 12.1 The Company may change or update this Privacy Notice at any time.
- 12.2 Should we change our approach to data protection, you will be informed of these changes or made aware that we have updated the Privacy Notice so that you know which information we process and how we use this information.
- 12.3 This Privacy Notice was last updated and reviewed on 22 March 2022.