

PRIVACY NOTICE FOR JOB CANDIDATES

Privacy Notice

Vedder Price respects your privacy and is committed to protecting the Personal Information that you submit in connection with a job application, including submission through our online recruitment portals. “**Personal Information**” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. This Privacy Notice (the “**Notice**”) is intended to disclose what Personal Information we will collect, how we will use, process, maintain, or share it, and what your rights are with respect to the information in the context of our recruitment and hiring practices. To the extent you have further questions about our privacy practices more generally and outside recruitment and hiring, including processing of your data via use of our website, please review our Website Privacy Policy.

About Us

This Notice applies to the following entities:

- Vedder Price P.C. – having its headquarters at 222 N. LaSalle Street, Chicago, IL, 60601;
- Vedder Price LLP – a limited liability partnership incorporated under the laws of England and Wales and registered under number OC366572 and having its registered office address at 4 Coleman Street, 6th Floor, London EC2R 5AR. Vedder Price LLP is registered with the UK Information Commissioner's Office (“**ICO**”) under registration number Z2854671 and is authorized and regulated by the Solicitor’s Regulation Authority;
- Vedder Price (CA) LLP – having its registered address at 1925 Century Park East, Suite 1900, Los Angeles, CA 90067;
- Vedder Price (FL) LLP – having its principal address at 600 Brickell Avenue, Suite 1500, Miami, Florida, 33131;
- Vedder Price Pte Ltd. – having its registered address at 10 Collyer Quay #37 06/10, Ocean Financial Centre, Singapore, 049315;

(collectively, “**Vedder Price**,” “**we**,” “**us**,” or “**our**”).

Depending on where you are located and the location of the office to which you are applying, the controller of your Personal Information, as processed by us under this Notice, will be different.

Contact Information

If you have any questions about this Notice, including any requests to exercise your legal rights, please contact the person within the organization with whom you have been liaising in relation to your application. Our Office of the General Counsel and our appointed Information Compliance Officer are responsible for overseeing questions in relation to this Notice.

PRIVACY NOTICE FOR JOB CANDIDATES

Questions, concerns, requests, or complaints regarding this Notice and the processing of personal information by Vedder Price should be directed via email to dataprivacy@vedderprice.com, or in writing to the addresses below.

For applicants to any of our U.S. offices:

Vedder Price P.C.
Attn.: Office of the General Counsel
222 N. LaSalle Street, Suite 2600
Chicago, IL 60601

For applicants to our London or Singapore offices:

Vedder Price LLP
Attn.: Information Compliance Officer
4 Coleman Street
London
United Kingdom
EC2R 5AR

Information We Collect and How We Use Your Personal Information

Information that you provide as part of the application process

As part of our recruitment and hiring practices, including when you use our online recruitment portals made available to you online, we may collect, store, and use the following types of Personal Information about you:

- Contact information, including first name, last name, email address, physical address, and work and personal telephone numbers (“**Contact Details**”)
- Information you use to set up an account on our recruitment portal such as your username and password (such information may also include your Contact Details) (“**Username Details**”)
- Information you provide us so we are able to carry out any background checks on you as part of our recruitment practices, including date of birth and address history for the last five (5) years (“**Background Checks Data**”)
- Professional or employment-related information, including previous education, work experience, professional qualifications, job title, employment history, and academic and educational background, as well as information collected from the recruitment and hiring processes, including in your CV/resumé and cover letter, details in any application forms and during an interview, letters of reference, transcripts, pre-hire interactions, and letters of offer (“**Recruitment Data**”)
- Survey or feedback information (“**Survey Data**”)

PRIVACY NOTICE FOR JOB CANDIDATES

- Your immigration status, residency, citizenship, or work authorization status, visa number, military status, sponsorship requirement, nationality, and passport information. For U.S.-based applicants, this may also include your social security number, taxpayer identification information, state identification card number, driver's license number, and/or employee identification number (collectively, "**Right-to-Work Data**")
- Information used to monitor equality and diversity or as may be collected for our legitimate business purposes under applicable law including sex, gender, marital status, race, ethnic origin, religious or similar beliefs, age, sexual orientation, veteran status, physical and mental health, or special accommodations, as needed ("**Diversity Data**")

Information that we collect about you

If you are using our online recruitment portal, we may collect certain technical information about you. For further information, please see our [Privacy Policy](#). For more information on how we use cookies and similar tracking technology, please see our [Cookie Policy](#).

Information that we obtain from third-party sources

From time to time, we may receive Personal Information about you from third party sources ("**Third Party-Sourced Data**") such as social network sites, external job boards, background check and search providers, test providers, public databases (where permitted by law), your named referees, corporate websites, your business associates and our representatives, and agencies (including recruitment agencies and credit reference agencies).

Special Categories of Personal Information or Sensitive Personal Information

For the purposes of UK GDPR, some of the Personal Information which you provide to us, or which we may receive, may be "special categories" of Personal Information. This is defined by UK GDPR to include Personal Information revealing a person's racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data, sex life, sexual orientation, or data concerning health.

Similarly, for purposes of applicable U.S. state privacy laws, some of the Personal Information which you provide to us, or which we may receive, may be "sensitive personal information." This is defined under U.S. state privacy laws to include, as may be applicable, social security number, driver's license, state identification card, citizenship, immigration status, passport number, geolocation data, racial or ethnic origin, religious or philosophical beliefs, union membership, sexual orientation, account log-in data, and other personal information.

Please see the table below and additional information herein regarding how we may use your Special Categories of Personal Information or Sensitive Personal Information.

Aggregated data

We may collect, use, and share "aggregated data" such as statistical or demographic data for any purpose. This aggregated data could be derived from your Personal Information but is anonymised and not considered Personal Information as this data will not directly or indirectly reveal your

PRIVACY NOTICE FOR JOB CANDIDATES

identity. For example, we may use anonymized, aggregated, statistical information for purposes that include testing our IT systems, research and data analysis, improving our online services, and/or to calculate the number of applicants on our recruitment portal. We may also share such anonymized information with third parties.

How we use your Personal Information

Your Personal Information will be used by authorized Vedder Price personnel for the purposes of evaluating your eligibility for employment and assessing your credentials. We may also use or disclose your Personal Information for the following purposes:

- for compliance with legal and regulatory obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements;
- to prevent or investigate fraud or other unlawful activity, and to protect the security of Vedder Price’s property, website, and other systems;
- to contact you in relation to this job opening or any future job postings relevant to your expertise;
- to assess your skills, qualifications, and suitability for the work or role;
- to carry out background and reference checks, where applicable; and
- to keep records related to our hiring processes.

The following table sets out the categories of Personal Information as categorized above and how we use that information. The table also lists the legal bases on which we rely to process Personal Information.

The Personal Information we may collect from you	How we use it	Lawful Basis
Username and Contact Details	To allow you to create a Vedder Price careers account with us.	<p>To pursue our legitimate interests in deciding whether to appoint you to the role or for the work since it would be beneficial to our business to appoint someone to that role or for work.</p> <p>To pursue your legitimate interests in receiving updates on your application/the recruitment process.</p>

PRIVACY NOTICE FOR JOB CANDIDATES

The Personal Information we may collect from you	How we use it	Lawful Basis
Contact Details	To communicate with you about the recruitment process. For example, to provide an update as to your progression (including whether we are offering you the role or work), invite you for an interview and / or to inform you of further tasks to be completed.	See above.
Contact Details	To provide you with the support you have requested. To provide you with information and materials you have requested from us.	See above.
Contact Details	Where permitted by applicable law, we and/or our selected third parties may contact you with information about new job/work opportunities that might be of interest to you.	To pursue our and your legitimate interests to keep in touch with you about further job opportunities that may be of interest to you. If we are unable to rely on legitimate interests, or if required under applicable law, we will get your consent.
Survey Data	To allow you to complete any surveys we send you.	Either consent (if required under applicable law) or our and your legitimate interests; namely, to keep in touch with you about further job opportunities that may be of interest to you.
Recruitment Data	To assess your skills, qualifications, and suitability for the work or role.	To pursue our legitimate interests in deciding whether to appoint you to the role or for the work since it would be beneficial to our business to

PRIVACY NOTICE FOR JOB CANDIDATES

The Personal Information we may collect from you	How we use it	Lawful Basis
		appoint someone to that role or for work.
Third-Party-Sourced Data	To assess your skills, qualifications, and suitability for the work or role.	See above.
Background Checks Data	To assess your suitability for the work or role at Vedder Price.	To pursue our legitimate interests in deciding whether it is appropriate to appoint you to the role or for the work.
Your criminal record	To establish your suitability for the work or role and carry out background checks. We will collect information about any criminal convictions on your record where we are legally able to do so or where it is appropriate given the nature of the work. Where appropriate, we will collect information about any criminal convictions on your record as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.	<p>It is necessary for compliance with a legal or regulatory (e.g., the SRA in the UK) obligation to which Vedder Price is subject (for example, where we must carry out criminal record checks for certain roles). Alternatively, it is necessary for the purposes of Vedder Price's legitimate interests (for example, to check the suitability of staff where, although there is no legal obligation to carry out a criminal record check, it is clear from the circumstances of the work that checking is justified).</p> <p>Such processing is also necessary to carry out the obligations and exercise specific rights of Vedder Price or its staff in the field of employment (including but not limited to complying with applicable regulatory requirements).</p>

PRIVACY NOTICE FOR JOB CANDIDATES

The Personal Information we may collect from you	How we use it	Lawful Basis
Health-related information, including disability.	To consider whether we need to provide appropriate adjustments during the recruitment process; for example, whether adjustments need to be made during a test or interview.	To carry out our legal obligations or as is necessary for the purposes of carrying out legal rights and obligations in the field of employment law.
Diversity Data (including Special Categories of Personal Information as defined further above)	To ensure meaningful equal opportunity monitoring and reporting.	<p>To pursue our legitimate interests in reviewing and monitoring equality and diversity and to comply with applicable legal or regulatory obligations.</p> <p>Where the processing involves Special Categories of Personal Information, such information is needed in the public interest, such as for reviewing the existence or absence of equal opportunities or treatment between groups of people with a view to maintaining and promoting such equality, or promoting racial and/or ethnic diversity at the senior level.</p> <p>If we are unable to rely on any of the above lawful bases, we will rely on consent.</p>
Right-to-Work Data	To establish whether you are legally entitled to work in the country of the Vedder Price office to which you are applying.	For compliance with a legal obligation.
All Personal Information referred to above.	To enable us to comply with any legal or regulatory requirements and otherwise to meet applicable	To comply with our legal obligations. Otherwise, to pursue our legitimate interest (for the purpose of

PRIVACY NOTICE FOR JOB CANDIDATES

The Personal Information we may collect from you	How we use it	Lawful Basis
	requirements of any relevant regulator or competent authority.	establishing, exercising, or defending our legal rights).
All Personal Information referred to above.	To exercise or protect the rights, property, or personal safety of Vedder Price, its customers, staff, or others.	To pursue our legitimate interests in protecting the rights, property, or personal safety of Vedder Price, its customers, staff, or others (including for the purpose of establishing, exercising, or defending our legal rights).

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided under the “Contact Information” section above.

If you fail to provide certain information

If you fail to provide certain information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application successfully.

Who we share your information with

We may share your information with the following individuals and entities:

- Other entities in the Vedder Price group. *See* the “About us” section above for further information regarding the Vedder Price group of entities.
- To the external recruitment agents/consultants that brought your application to our attention, if applicable.
- Third-party vendors and our other partners who provide data processing services to Vedder Price, including, but not necessarily limited to, the provider of our workplace and recruitment portals, providers which support us with communications, applicant tracking, fraud prevention, web hosting, or analytics or who otherwise process Personal Information for purposes that are described in this Notice or notified to you when we collect your Personal Information. In the event we extend an offer of employment to you, these third party vendors or partners may also include providers of background checks associated with your employment.

PRIVACY NOTICE FOR JOB CANDIDATES

- Any competent law enforcement body, regulatory body, governmental agency, court, or other third party where we believe disclosure is necessary (i) for compliance with laws or regulations, (ii) to exercise, establish, or defend our legal rights, (iii) to detect and investigate illegal or wrongful activities and/or breach of contract, (iv) to exercise or protect the rights, property, or personal safety of Vedder Price, its clients, staff, or others, or (v) to protect your vital interests or those of any other person.
- Our insurers.
- Purchasers and third parties in connection with a business transaction: Your Personal Information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganization, financing, change of control, or acquisition of all or a portion of our business.
- A potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business.
- Any other person as may be envisaged under this Notice.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your Personal Information in line with our policies. We do not allow our third-party service providers to use your Personal Information for their own purposes. We only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

Third-Party Sites and Platforms

This Notice does not apply to third-party content, websites, or platforms. If individuals decide to provide their information to these third-party sites, they must be aware that Vedder Price does not take any responsibility for their compliance with data privacy laws. Individuals are encouraged to make themselves aware of applicable privacy policies before they provide their Personal Information to these third-party sites.

Retention of Personal Information

We will only retain your Personal Information for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements and our legitimate business interests. When we have no ongoing legitimate business need or legal obligation to process your Personal Information, we will either delete or anonymize it.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, reporting, or other requirements.

PRIVACY NOTICE FOR JOB CANDIDATES

The length of the retention period of your Personal Information after we have notified you of the outcome of the recruitment exercise (or after the recruitment exercise has otherwise concluded) may be different depending on the location of the office to which you are applying. If an applicant is successful, their data is likely to be transferred to their personnel file, which we will keep in accordance with our retention practices in relation to our staff. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Security Standards

We understand that the security of your Personal Information is important to you. When handling Personal Information, security is paramount, and we seek to ensure that Personal Information is adequately and appropriately protected. The information you provide to Vedder Price is securely processed, stored, and maintained by us and, where relevant, our providers. We ensure that appropriate technical and organizational measures are implemented and maintained to ensure a level of security appropriate to the risks represented by the processing and the nature of the Personal Information to be protected.

Only authorized Vedder Price personnel have access to your information, and those individuals are only allowed to use that information as part of the hiring process. Any Vedder Price employee who knowingly violates these policies is subject to disciplinary action, including the possibility of termination in serious cases. In addition, we have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Despite our efforts, we cannot guarantee the security of information transmitted over the Internet or that Personal Information will not be accessed by unauthorized persons. You should take adequate precautions to protect your Personal Information.

Vedder Price does not sell any applicant information to third-party marketing companies.

Your U.S. State Privacy Rights

Depending on the U.S. jurisdiction in which you live, you may have the following rights subject to the exceptions allowed by law:

- *Transparency:* Businesses that collect Personal Information subject to applicable laws are required to provide you with notice regarding the categories of Personal Information to be collected, the purposes for which the categories of Personal Information are collected or used, whether that information is sold or shared, and the length of time we intend to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period, among other information.
- *Access:* You may have the right to inquire about the categories and specific pieces of Personal Information Vedder Price has collected about you, the categories of sources from which the Personal Information is collected, the business purpose for collecting the Personal Information, and the categories of third parties with whom Vedder Price shares Personal Information.

PRIVACY NOTICE FOR JOB CANDIDATES

- *Correction:* You may have the right to correct inaccurate or obsolete Personal Information that Vedder Price may maintain.
- *Deletion:* You may have the right to request deletion of Personal Information under certain circumstances.
- *Non-discrimination:* You may have the right not to be discriminated against based on your exercising any of your rights afforded by state law.
- *Limitation:* You may have the right to limit the use and disclosure of Sensitive Personal Information. In connection with your application for employment, Vedder Price does not use your Sensitive Personal Information in any matter that requires the right to limit because Vedder Price only collects, uses, or discloses Sensitive Personal Information as necessary to consider your eligibility for employment and evaluate your job credentials, and does not sell or share Sensitive Personal Information.

To exercise your rights, please contact us at dataprivacy@vedderprice.com, or call us at (312) 609-7500 ext. 7750.

We will first acknowledge receipt of your request within 10 business days and then provide a substantive response within 45 calendar days after its receipt. If we require more time (up to 90 days or the permitted timeframe), we will inform you of the reason and extension period in writing. If you are a Virginia, Colorado, or Connecticut resident and we deny your request, you may appeal our decision by emailing your request to dataprivacy@vedderprice.com or calling us at (312) 609-7500 ext. 7750. Within 45 calendar days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decision.

Only you or your authorized agent may make a verifiable consumer request related to your Personal Information. To respond to your requests, we must verify your identity.

- *How to Authorize an Agent:* You may designate an authorized agent to submit your verified consumer request on your behalf, but only if the authorized agent has your written permission to do so and you have taken steps to verify your identity directly with us.
- *How We Verify Your Request:* We will only use the Personal Information provided in the context of your request to verify your identity or the authority of your authorized agent to make the request. Depending on how you interact with us, we may require that you provide at least two pieces of Personal Information, such as your name, email address, phone number, or other information that we already have in our possession. We will verify your request by comparing the information you provide to information already in our possession to minimize the risk of fraud.

For any questions, concerns, requests, or complaints regarding this Notice, please send a request using the contact details specified at the beginning of this Notice.

Your Rights under the UK GDPR

PRIVACY NOTICE FOR JOB CANDIDATES

If our processing of your Personal Information is subject to UK GDPR, you have various rights in relation to the processing of your Personal Information, depending on the relevant situation. These include the following rights:

- *Right of access:* right to request confirmation as to whether or not your Personal Information is being processed by Vedder Price and, if so, the right to receive a copy of it;
- *Right to rectification:* right to request the rectification of your Personal Information without undue delay if you find that it is inaccurate, and the right to have incomplete personal data completed. It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during the recruitment process;
- *Right to erasure:* right to request the erasure or deletion of your Personal Information without undue delay depending on the circumstances. For example, this right does not apply if the processing is necessary to establish, exercise, or defend legal claims;
- *Right to restriction:* right to request, in some circumstances, to limit the purposes for which we process your Personal Information if the continued processing of the Personal Information in this way is not justified, such as where the accuracy of the Personal Information is contested by you;
- *Right to data portability:* right to request, in some circumstances, a copy of your Personal Information provided to us, in a structured, commonly used, and machine-readable format;
- *Right to object:* right to object, on grounds relating to your particular situation, to the processing of your Personal Information based on legitimate interests. In addition, you can object at any time to the processing of your Personal Information for direct marketing communications.
- *Right to withdraw consent:* if you have provided consent to any processing of your Personal Information, you have a right to withdraw that consent.

Please note that some of these rights are not absolute and there are a number of exceptions where we may not have an obligation to fulfill your request. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise, or defence of legal claims.

In order to exercise any of your rights, or if you have any other questions about our use of your Personal Information, including if you wish to obtain further details regarding our legitimate interests, please send a request using the contact details specified at the beginning of this Notice. Please note that we may ask you to provide us with additional information in order to verify your identity.

Save as provided under applicable data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the

PRIVACY NOTICE FOR JOB CANDIDATES

administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

We ask that you please attempt to resolve any issues with us first, although in any case, you also have the right to lodge a complaint with the competent data protection authority, in particular in the country of your habitual residence, place of work, or place of an alleged infringement if you consider that the processing of your Personal Information carried out by us infringes any applicable privacy laws. In the UK, you can complain to the ICO who can be contacted at <https://ico.org.uk> or by telephone on 0303 123 1113.

International Data Transfers

Vedder Price is an international law firm, with clients, affiliates, and offices located throughout the world. As our headquarters are based in the United States, your Personal Information will need to be transferred to the United States for the purposes referred to under this Policy.

In addition, when we disclose your Personal Information with the recipients mentioned further above in this Notice, it may involve transfers of your Personal Information overseas, which may include transfers to countries outside of the UK/EEA whose laws provide levels of protection for Personal Information that are not always equivalent to the level of protection that may be provided in your own country.

Vedder Price has procedures and contractual obligations in place to ensure that Personal Information is transferred, processed, and stored with appropriate safeguards and in accordance with applicable laws. Such appropriate safeguards include the international data transfer agreement issued by the ICO. We will provide you with details on the applicable safeguards and transfers upon request, to the contact details specified at the beginning of this Notice.

Changes to This Notice

Vedder Price reserves the right to change or update this Notice at any time. The applicable version of this Notice is available in the careers portal of our website.