

## **European Data Privacy Notice – Applicants**

**Effective date: 14<sup>th</sup> February 2018**

### **Information that we use**

By submitting your resume or an employment application to Franklin Templeton, we will obtain or have access to certain information about you including your name, address, date of birth, education and qualifications, training, previous employment, references and other related details you provide or are provided about you in the course of your employment application.

We may also obtain further information about you by contacting the references you have given (such as employers and educational establishments), through recruitment agencies, and by undertaking background vetting checks including criminal records checks where this is authorised by applicable law.

We may also send you surveys. These may concern diversity, as described below, or they may contain other questions about your experience of applying to work with us. Completing these surveys is voluntary.

### **What we use your information for**

We use the information we collect from you for the purposes of:

- Evaluating and progressing your employment application;
- Creating your employee personnel file, if hired;
- Maintaining our own internal records of employment applications;
- Protecting the rights and legitimate interests of Franklin Templeton and others, for example by conducting pre-employment screening processes to ensure both compliance with legal obligations and the quality and integrity of hiring processes;
- In the case of survey information, to improve our recruitment process;
- Improving our recruitment website.

If you are recruited, we will use your information as described in the privacy notice which we give to employees. We will provide you with a copy of this privacy notice, if you are successful in your application.

In some circumstances it will be necessary for you to provide the personal data to us. We will make it clear if and when this situation arises. This need will arise where there is a requirement under law for us to obtain certain information from you or where it is necessary to obtain certain information from you in order to enter into or perform a contract with you, such as where there is a pre-employment screening process. Where you fail to provide the necessary information, this may result in us being unable to progress with your application.

### **Legal basis on which we use your information**

We also process your data for the purposes identified above, as necessary (i) for our legitimate interests and the legitimate interests of third parties (such as: the management of Franklin Templeton's business and brand; upholding the quality and integrity of our hiring process through pre-employment screening and onboarding processes; improvement of our recruitment processes and liaising with our business partners and group companies) which will only apply where we consider that the legitimate interest is not overridden by your interests or rights which require protection of your data; (ii) to comply with our legal obligations; and (iii) to enter into a contract with you or to perform our obligations under your

employment contract, should your application be successful. If you require further information regarding Franklin Templeton's legitimate interests as applied to your personal data, you may contact the Data Protection Officer.

We also process your data where you have otherwise provided consent. Where you have given consent, you will be able to withdraw this consent at any time by contacting the Data Protection Officer.

### **Sharing your data**

We may share your data with other companies in the Franklin Templeton group for the purposes of group personnel management and administration.

We may also share your data with our insurers, professional advisors, service providers (including Oracle Corporation and Workday, if you are recruited), references and referees. The list of our service providers will change from time to time depending on business needs. If you require further information regarding Franklin Templeton sharing your personal data with third party service providers, you may contact the Data Protection Officer.

### **Diversity Monitoring**

During the application process, we may ask for your explicit consent to collect the following information about you in accordance with our diversity policy: age, gender, gender identity, sexual orientation, disability status and ethnicity.

This information will only be used in connection with our and the Franklin Templeton group's (including Franklin Resources Inc. in the United States) diversity policy and to analyse applicant diversity. It will not be taken into consideration in our recruitment decision and it will not be shared with the persons making the recruitment decision.

### **Transfers of your data outside the EEA**

The information we collect from you may be transferred to, and stored, outside your country of residence (including, for example, by Franklin Resources Inc. in the United States). The countries that we transfer data to outside of the EEA include: Australia, Canada, China, Hong Kong, India, Japan, Korea, Malaysia, Singapore, Switzerland, Turkey, United Arab Emirates and the United States.

If you are based in the EEA and we need to transfer your personal information outside of the EEA, we have taken steps to make sure your personal information is protected in line with applicable law, including use of Model Clauses approved by the European Commission under Article 46 of the General Data Protection Regulation ("GDPR"). You can request a copy of the safeguards in place which relate to transfers of your personal data by contacting the Data Protection Officer.

### **How long we keep your data for**

We keep your personal information for as long as is necessary in connection with the purposes identified above. Where you are unsuccessful in your application, this will typically be the legal period during which a claim may be made in the country in which you are applying or it could be longer in case you are considered a candidate for another position in our firm. If you are successful, this will be for the duration of your employment with Franklin Templeton plus a period following your employment in accordance with local retention periods which is also reflected in our Europe Record Retention Policy. Diversity

monitoring information and other survey information may be kept for longer to enable us to measure changes in our recruitment and the success of our diversity policy. If you require further information relating to the retention periods which apply to your personal data, you may contact the Data Protection Officer.

## **Your rights**

You have a number of rights when it comes to our handling of your data. These include the following rights:

- Right to access personal data;
- Right to restrict processing of personal data;
- Right to object to processing of personal data;
- Right to rectification of personal data;
- Right to request that personal data is erased;
- Right to data portability.

A summary of each right and how you can take steps to exercise it is available from the Data Protection Officer.

Where your personal data are used to target marketing to you, you have the right to object to this at any stage.

You also have the right to object to processing of your personal data where the legal basis of the processing is our legitimate interests. We will stop processing until we are able to confirm that we have grounds to continue processing your data.

You also have the right to complain to the data protection regulator local to where you live, work, or where a breach of data protection legislation has taken place about our handling of your personal information.

## **Our contact details**

Please get in touch with our Data Protection Officer at the following email address:  
[DataProtectionOfficer@franklintempleton.com](mailto:DataProtectionOfficer@franklintempleton.com).

On occasion, the Franklin Templeton group company who is the data controller as set out below will be a joint controller with another Franklin Templeton group company. Where the other Franklin Templeton group company is based outside the EEA, then the data controller responsible for responding to requests to exercise data subject rights will be the relevant company set out below. In all cases, any complaints and requests to exercise data subject rights should be addressed to the Data Protection Officer and the Data Protection Officer will arrange for the responsible joint controller to handle the complaint or request.

**Austria:**

Franklin Templeton Austria GmbH  
Universitätsring 10  
4th Floor, 1010 Vienna, Austria

**Belgium:**

Franklin Templeton International Services S.à r.l., Belgian Branch  
28 avenue Marnix  
1000 Brussels, Belgium

**France:**

Franklin Templeton France SA  
20 Rue de la Paix  
75002 Paris, France

**Germany:**

Franklin Templeton Investment Services GmbH  
Franklin Templeton Investment Management Limited German Branch  
Mainzer Landstr. 16  
D-60325 Frankfurt am Main. Germany

**Netherlands:**

Franklin Templeton Investment Management Limited  
World Trade Center Amsterdam  
H-toren, 16e verdieping  
Zuidplein 134  
1077 XV Amsterdam, Netherlands

**Hungary:**

Franklin Templeton Magyarország Kft.  
1051 Budapest  
Sas utca 10-12,  
Hungary

**Italy:**

Franklin Templeton International Services S.à r.l., Italian Branch  
Franklin Templeton Italia SIM S.p.A.  
C.so Italia, n.1  
20122 Milano, Italy

**Luxembourg:**

Franklin Templeton Management Luxembourg S.A.  
Franklin Templeton International Services S.à.r.l  
8A, rue Albert Borschette

L-1246 Luxembourg  
Grand Duchy of Luxembourg

**Poland:**

Templeton Asset Management (Poland) Towarzystwo Funduszy Inwestycyjnych S.A.  
Franklin Templeton Investments Poland Sp. z o.o.  
Rondo 1, 29th Floor, Rondo ONZ 1  
Warsaw 00-124

**Romania:**

Franklin Templeton Investment Management Ltd UK  
Premium Point, 78-80 Buzesti, 08th floor  
District 1, Bucharest, Romania

**Slovakia:**

Franklin Templeton Slovakia, s.r.o.  
Regus Business Centre  
Karadzicova 8/A  
821 08 Bratislava, Slovakia

**Spain:**

Franklin Templeton Investment Management Limited  
Calle Jose Ortega y Gasset, 29–5a planta  
28006 Madrid, Spain

**Sweden:**

Franklin Templeton Investment Management Limited  
Blasieholmsgatan 5  
SE-111 48 Stockholm, Sweden

**United Kingdom:**

Franklin Templeton Investments Management Limited  
Cannon Place, 78 Cannon Street  
London EC4N 6HL, United Kingdom

Franklin Templeton Global Investors Limited  
Franklin Templeton Investment Management Limited  
5 Morrison Street  
Edinburgh, EH3 8BH, United Kingdom