

## **IFM Group Candidate Privacy Notice**

IFM Investors Pty Ltd ("IFM Investors") and its subsidiaries, branches, local employing entities, associates, and affiliated companies (hereafter "IFM", "IFM Group", "us," "our", or "we") are committed to protecting and securing the privacy and confidentiality of the Personal Data<sup>1</sup> which it collects directly or indirectly from you when applying for a job at IFM either directly via career portals, third-party platforms, or indirectly via referrals, third-party human resources agency, and any other platforms that may be applicable. This notice (the "Notice") outlines and explains how IFM, will process<sup>2</sup> your Personal Data in accordance with applicable privacy legislation(s).

#### **Contact details**

IFM is the controller for the Personal Data we process unless otherwise stated.

You can contact us by either email or post.

Our postal address for Australia is:

Attn: Privacy Officer

Address: Level 33, 50 Lonsdale Street

Melbourne VIC 3000

Australia

The postal addresses for all IFM office locations can be found here.

Alternatively, you can contact us via email at dataprotection@ifminvestors.com.

#### What does this Notice cover?

This Notice aims to provide job candidates ("you") with information on what Personal Data we process about you, why and how we process your Personal Data, including details on the privacy principles we will abide by, and inform you of certain rights which you may be able to exercise in respect of your Personal Data.

#### What Personal Data do we collect?

When you apply for a position at an IFM entity, depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below.

Categories of Personal Data	Examples
Personal details	Full name; date of birth; gender; marital status; nationality; passport information; residency; work permit status; national insurance number (if applicable); tax identification numbers; superannuation selections;
Private contact details	Address; email address; telephone number (including mobile phone number) and emergency contact information.
Your education and employment history	CV and covering letter (if applicable); education details; contractor pay rates; employment history; qualifications; technical skills; professional certifications; background checks (including criminal checks); records of reference checks; records of work absences.

## How do we collect your Personal Data?

We collect some of your Personal Data directly from you. We also collect Personal Data about you from third parties. For example, we may pass your information on to external recruitment providers or receive information

<sup>&</sup>lt;sup>1</sup> Personal Data' means any information about you from which you can be identified (whether derived from that information on its own or when combined with other information that we or another party may hold about you).

<sup>&</sup>lt;sup>2</sup> Processing means any activity or set of activities which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



about you from organisations you have asked us to use for professional or academic references, such as a previous employer, a college or university, or background check providers.

## How we use your Personal Data?

We collect and use your Personal Data for the purposes set out in the table below. The section above, titled 'How Do We Collect Your Personal Data?', sets out the details of the types of Personal Data we collect and process for these purposes.

#### **Purpose**

#### To facilitate our recruitment process

- to assess your qualifications for a particular job or task;
- to ensure that we can respond (including with Generative Artificial Intelligence) to any queries and contact you if you request us to do so;
- · to verify details you have provided or to request information (such as references and qualifications; and
- to determine whether we should enter into a contract with you (for your services or employment, as applicable).

#### Carrying out actions required of us by applicable law

- to ensure that we provide appropriate adjustments for tests, interviews and other parts of the recruitment process (with respect of any disability status or health conditions);
- to ensure that we comply with requirements relating to equal opportunity monitoring and reporting;
- · to carry out any criminal record checks to the extent that this is required by local laws; and
- to comply with any other applicable legal requirements under business, financial and employment legislation.

## For internal administrative purposes

• to enable us to keep internal records relating to the recruitment process for administrative purposes.

#### To enforce our legal rights

- to seek professional advice, including legal advice, or enforce your obligations or enforce our rights;
- · to help us establish, exercise or defend legal claims; and
- to prevent any individual from harming or engaging in illegal or unlawful activities.

#### Why we process your Personal Data?

- 1. We process your Personal Data for specified purposes and on the following legal grounds for the various situations which may arise during the job application process with us:
  - When processing your Personal Data, we are relying on the legal basis that processing your Personal
    Data is within our legitimate interests, namely to facilitate our recruitment process, internal
    administrative process, or to enforce our legal rights;
  - We also rely on the legal basis that processing is necessary for us to enter into a contract with you. For example, where you have been successful in the process, and we wish to enter into an employment contract with you; and
  - When processing your sensitive Personal Data, is necessary for us to exercise our rights or carry out our employment and social security law obligations.
- 2. In exceptional circumstances, you may request us to disclose your Personal Data to third parties or organisations, such as a law firm handling a claim on your behalf or otherwise.

## With whom we share/disclose your Personal Data

We may share/disclose your Personal Data with any of the following parties:

• **IFM:** We may share your Personal Data only with a limited number of employees of IFM – such as your potential/future manager(s), employees of the recruiting team, local HRs and, if applicable, teams such as IT and selected employees of our external service providers who support us regarding your recruitment application.



- Our service providers: We may share your Personal Data with third-party service providers who perform functions on our behalf, such as Information security and IT service providers (including technology services that may also support Generative Artificial Intelligence).
- Regulators or other authorities and third parties: We may share your Personal Data in order to
  comply with our legal and regulatory obligations, such as regulators or tax authorities, when, in our
  reasonable opinion, the law or other regulation requires us to share this data (for example, because of
  our obligations to tax authorities). We may also share your Personal Data where we think this is
  necessary, for example, to meet our legitimate interests and protect our business, including from fraud
  and legal claims.

We may conduct background checks prior to you commencing employment with us. In order to do so, IFM may be required to share your Personal Data with the relevant third parties. These checks will be performed by our Personal Data Processors,<sup>3</sup> who will conduct background screening on our behalf.

## Is your data transferred across international borders?

We may transfer your Personal Data to IFM offices and authorised third parties located outside of your country and take organisational, contractual and legal measures to ensure that your Personal Data are exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard your Personal Data. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your Personal Data from your habitual place of residence to countries that do not offer adequate protections, then we will ensure that appropriate safeguards, as required by applicable laws, are put in place prior to the transfer of the data. For example, incorporating standard contractual clauses or data transfer agreement(s) established between the parties transferring the Personal Data. Further details of these transfers are available from us on request.

## How long do we retain your Personal Data?

We will take reasonable steps to keep the Personal Data of unsuccessful Applicants for no longer than is necessary for the purposes for which we collected it, subject to any legal obligation to retain Personal Data. If you are successful in your application, the Personal Data gathered through the recruitment process will be retained in line with the IFM Group Employee Privacy Notice, which will be available at the time of onboarding.

When determining the length of time, we take into account factors such as our legal or regulatory responsibilities, including complying with any required retention periods and limitation periods relevant to legal action. In some cases, Personal Data may be held for (a) a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose) or (b) a shorter period where the individual objects to the processing of their Personal Data and there is no longer a legitimate business purpose to retain it.

## How do we safeguard your Personal Data?

We implement and maintain appropriate technical, organisational, and physical security measures to protect your Personal Data that align with cybersecurity requirements from certain leading standards (such as the National Institute of Standards and Technology and the International Organisation for Standardization).

These include, but are not limited to:

- Access to Personal Data is based on the need-to-know and least privilege principle to ensure that Personal Data is only accessible to authorised individuals for the performance of their duties.
- Layered security controls ranging from perimeter security to end user machine level controls such as firewalls, spam protection, antivirus and spyware solutions, security awareness training, and incident

<sup>&</sup>lt;sup>3</sup> A Personal Data Processor is an organisation or individual that does the processing of Personal Data defined by IFM. Processors are accountable to IFM and must assist in their data protection obligations.



management are applied.

- To further reduce the risk associated with processing the Personal Data, we make use of techniques to make your Personal Data anonymous where possible.
- We use encryption mechanisms, where appropriate, such as email encryption, encryption of Personal Data during transfer, secure VPN access, and disk level encryption, etc.
- Third parties that process Personal Data on our behalf do so according to our written instructions. They
  are bound by confidentiality and must implement suitable technical and organisational measures to
  ensure the Personal Data is secure.

## What if you do not provide Personal Data?

Depending on the type of Personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our obligations as they relate to job application formalities, employment, tax, and other applicable laws and regulations with respect to your recruitment and employment. If you have concerns about providing certain data, please reach out to us to discuss potential alternatives.

## Your rights in relation to your Personal Data?

You have certain rights in relation to the Personal Data IFM holds about you. These rights vary depending on the country where you are based. Further information about your rights, and how you can exercise them, is provided in this **Addendum 1**.

# Who can you contact if you have a query, concern, or complaint about your Personal Data?

If you have any issues, queries or complaints regarding the processing of your Personal Data, please contact us at <a href="mailto:dataprotection@ifminvestors.com">dataprotection@ifminvestors.com</a>. For more details, please refer to the section 'Contact Details' above. If you are unsatisfied with the handling of your Personal Data by IFM, please refer to <a href="mailto:Addendum 2">Addendum 2</a> for the Country/State specific supervisory authority list.

Information about IFM's Privacy Statement is available here.

## How do we update this Notice?

This Privacy Notice was last updated on 11 April 2025.