



## EMEA T. Rowe Price Applicant Privacy Notice

T. Rowe Price International Ltd, 60 Queen Victoria Street, London EC4N 4TZ, and T. Rowe Price (Luxembourg) Management Sàrl, 35, Boulevard du Prince Henri, L-1724 Luxembourg, Grand Duchy of Luxembourg, have prepared this EMEA T. Rowe Price Applicant Privacy Notice (“**Notice**”) to be provided to individuals applying for (or exploring) roles with either firm (individually and collectively, “**T. Rowe Price**”). When we say, “T. Rowe Price,” “we” or “us” in this document, we mean the T. Rowe Price entity that you are applying to work for or are interested in. In addition, you will see a number of references to the “T. Rowe Price Family,” which includes other T. Rowe Price entities globally, including T. Rowe Price Associates, Inc., and T. Rowe Price Group, Inc., both in the United States. This Notice explains the types of personal data we collect, how we use it, who we share it with, how we protect it, and your legal rights. Please read the following carefully as it explains our views and practices regarding your personal data and how it is handled.

T. Rowe Price needs to process your personal data in order to make you aware of roles and to process your application for employment. There are also statutory requirements we have to comply with in relation to your application. If we are not able to carry out the processing activities that we describe in this Notice, we may not be able to continue with your application. Of course, we hope it would never come to that, and this is simply information we are obliged to provide to you as part of this Notice.

In certain limited circumstances, we may need to ask for your specific consent to process your personal data in a particular way, such as for the purpose of conducting background checks prior to you commencing employment with us, to enable relevant third parties to release information about you as part of those checks.

Although we would seek your consent in relation to certain background checks, you should note that, in most cases, we will process your personal data for the reasons set out in this Notice and it won't be appropriate or necessary for you to provide consent as the legal basis for processing your personal data.

We may collect personal data directly from you, or it may be supplied to us by another party, such as a recruiting agency or your previous employer. We may also collect personal data from other publicly or commercially available sources. We may create personal data about you, such as interview notes or records of your progress through the application process. We may use cookies and other technologies to collect personal information regarding interactions with our digital content, such as our websites, mobile applications, or emails. To learn more about how we use cookies, please see our [Cookie Policy](#). We process all data we obtain from you or other sources or that we create in accordance with this Notice.

“**Personal data**” means information that (either in isolation or in combination with other available information) enables you to be identified as an individual or recognised directly or indirectly.

### Categories of personal data

The categories of personal data that we may collect and use include:

- **personal information**, such as name and nickname, gender, date of birth, place of birth, age, passport details, government-issued numbers and identification documents, photos, signature, nationality and emergency contact details;
- **contact information**, such as your home and work postal addresses, email addresses and contact numbers for telephone, fax and mobile;
- **education and work experience**, such as contact details for your current/former employer, information about your educational background (including any professional credentials), your work experience and other experience included on your application form/ curriculum vitae (CV) or otherwise collected as part of the recruitment process;

All information included in this memorandum is for internal T. Rowe Price use only and should not be distributed externally. External use of this memorandum may only be permitted upon Legal review and approval. Proprietary and Confidential.

- **other application data**, such as the information included in your application form/CV, your bank account details, current and expected salary and your photo if you choose to provide it;
- **information collected as part of the recruitment process**, such as notes taken from your interview or information provided from recruitment agencies;
- **background check information**, such as information obtained through reference checks, confirmation about your work/educational background, previous addresses, current and past directorships held by you and members of your immediate family, credit history and fingerprints;
- **technical information when you access our digital content**, including your IP address, your login information, browser type and version, device identifier, location and time zone settings, browser plug-in types and versions, operating system and platform, page response times and download errors;
- **information about your interactions with our digital content**, such as the websites you visit before our websites, number of visits to digital content, length of visits to certain pages, pages viewed, page interaction information (such as scrolling, clicks and mouse overs) and methods used to browse away from the page and similar information for additional materials that can be accessed from our digital content, such as opening or closing documents or which videos are played and for how long;
- **information regarding buildings and property**, such as CCTV images and other visitor access data where you have attended our offices for an interview; and
- **information relating to compliance matters**, such as data subject requests and supporting documentation, complaints, investigations, incident details and resolutions of such matters.

Together, “**Applicant Data.**”

In addition to the collection, processing and use of the Applicant Data, T. Rowe Price collects, processes and uses the following special categories of personal data about you that we describe as “**Sensitive Applicant Data**”:

- **health and medical data**, such as information on disability for purposes of accommodating your application and interview and compliance with legal obligations;
- **religious affiliations**, as needed, such as for purposes of scheduling interviews at appropriate times;
- **criminal records data**, in the event that T. Rowe Price has conducted or received the results of criminal records background checks in relation to you in the process of your application, where relevant and appropriate to the role that you are applying for;
- **race or ethnicity data**, such as information contained in your passport or other citizenship and right to work documentation and information that you have voluntarily provided to T. Rowe Price for the purposes of our equal opportunities and diversity monitoring and initiatives; and
- **sexual orientation data**, where this has been provided voluntarily to T. Rowe Price for the purposes of our equal opportunities and diversity monitoring and initiatives.

## How we use personal data

We use the Applicant Data and Sensitive Applicant Data that we collect from and about you and process it for a variety of purposes related to your application and the running of our business generally, based on one or more legal justifications, as set out below:

Purpose	Justification
To evaluate your application to determine your eligibility for the role you applied for and to process your job offer should you be successful.	It is in our legitimate interests to assess your suitability for employment/engagement with T. Rowe Price as permitted by local data protection law, including the processing of public data as made public manifestly by you.
To arrange required travel or to pay travel expenses in connection with your interview.	It is in our legitimate interests to process personal data in order to facilitate travel administration.

Purpose	Justification
To conduct background checks as part of your application for a job within the T. Rowe Price Family.	We will ask for your explicit consent before processing your information in this way when required and as allowed by local data protection or other law. In addition, it is in our legitimate interests to carry out the obligations and to exercise the specific rights of T. Rowe Price or you in the field of employment and social security and social protection law as permitted by local data protection or other law and/or a collective agreement.
To communicate with you, including communicating future employment opportunities, and to deal with your queries and requests, including to identify you when you contact us.	It is in our legitimate interests to process personal data in order to provide you with a tailored answer to your queries and requests.
To keep internal records and manage our relationship with you.	It is in our legitimate interests to keep records of your personal details and update these when necessary. It is also in our legitimate interests to keep records of any correspondence with you.
To manage our risks and legal rights, to help identify illegal activity and to monitor compliance with applicable policies, procedures and laws.	This processing is necessary for the purposes of complying with legal requirements and/or as part of our legitimate interests in managing risks to which our business may be subject or exercising or defending legal rights.
To comply with legal and regulatory requirements, including disclosures to tax or other regulatory authorities, inside or outside of your home country, and employment and immigration-related requirements along with the administration of those requirements.	This processing is necessary for the purposes of complying with legal requirements. Sometimes, legal requirements may apply to another company, or product or service offered within the T. Rowe Price Family, and it would be in our legitimate interests to assist in meeting such requirements.
To set up and manage your online registration.	It is in our legitimate interests to process personal data to manage the recruitment process and respond effectively to your requests.
To ensure that material from our digital content is presented in the most effective way for you and your device.	It is in our legitimate interests to process personal data in order to provide you with effectively presented digital content.
To process your personal data where this is necessary to keep our digital content and electronic systems safe and secure.	It is in our legitimate interests to monitor how our digital content and electronic systems are used to detect and prevent fraud, other crimes and misuse. In some instances, we may need to process information in this way to comply with laws that require us to keep our digital content and electronic systems safe and secure.
To effectively manage our business, such as concerning the products and services offered by the T. Rowe Price Family, service provider management, finance, security, information technology and physical infrastructure and corporate audit.	This processing is necessary for the purposes of complying with legal requirements, performing contractual obligations and/or as part of legitimate interests in managing our business and risks through the implementation and operation of a groupwide organisational structure and groupwide information sharing.
To help assess, manage and monitor our premises, such as through CCTV, visitor records and access devices.	It is in our legitimate interests to maintain the security and orderly functioning of our premises.
To maintain health and safety information,	It is in our legitimate interests to effectively manage our

Purpose	Justification
assessments and related recordkeeping.	premises and operations consistent with health and safety practices. In some instances, we may need to process this type of information in order to comply with law.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure that it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

## With whom do we share personal data?

Your personal data is intended for T. Rowe Price and may be shared with T. Rowe Price affiliates and subsidiaries and, in certain circumstances, with third parties.

We may share your personal data with:

- **T. Rowe Price’s family of companies.** As the T. Rowe Price entity that you’re applying to work for is part of a wider group of companies with headquarters in the U.S. and offices located across the globe (which all partially share management, IT, human resources, legal, compliance, finance and audit responsibility) we may share your personal data among our family of companies, including our subsidiaries and affiliates, in order to process your application and conduct the other activities described in this Notice.

We may also share your personal data with the following types of third-party organisations:

- **External auditors, accountants, and legal and other professional advisors.**
- **Our Service Providers.** We use other companies or contractors (“**Service Providers**”) to perform services on our behalf or to assist us with the operation of T. Rowe Price products or business operations. For example, when you use our online portal to apply for a job, the HR information database is currently operated by the service provider. We may share personal data with the following categories of Service Providers:
  - Infrastructure and technology Service Providers;
  - Analysis, research, event and communications providers; and
  - Providers of administrative services for T. Rowe Price, such as recruiting and travel services.

In the course of providing such services, these Service Providers may have access to your personal data. However, we will only provide our Service Providers with the information that is necessary for them to perform the services. They will act under our instructions, and we instruct them not to use your personal data for any other purpose. We will always use our best efforts to ensure that all the Service Providers we work with will keep your personal data secure.

- **Third parties permitted by law.** In certain circumstances, we may be required to disclose or share your personal data in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal data to the police, regulators, government agencies or to judicial or administrative authorities). We may also disclose your personal data to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, for matters of national security and law enforcement, to enforce our agreements or to protect your rights or those of the public.

- **Third parties in connection with ordinary business activities.** We may transfer your personal data, such as your business contact details, photo and biographical information collected during the application process, to third parties with whom we or another member within the T. Rowe Price Family interact in the ordinary course of business, such as when you are included on an email with others or to confirm your details or role.
- **Third parties connected with business transfers.** We may transfer your personal data to third parties (including existing or newly formed companies in the T. Rowe Price family of companies) in connection with a reorganisation, restructuring, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your personal data in a manner consistent with this Notice.

## Where we store your personal data

The personal data that we collect from you may be transferred to, and stored at, a destination outside the jurisdiction in which you are located.

If you are located in the European Economic Area (“**EEA**”) (or in the UK should it no longer be part of the EEA), this means the personal data may be transferred to, stored at and accessed from a destination outside the EEA (or the UK), including to T. Rowe Price Associates, Inc., in the United States. It may also be processed by staff operating outside the EEA (or the UK) and who work for us, an affiliate, or for one of our Service Providers. If you are located outside the EEA (or the UK), then in addition to the above, this means that personal data may be transferred to, and stored at, a destination in the EEA (or the UK).

For transfers to T. Rowe Price entities outside the EEA (or the UK), T. Rowe Price will be bound by the EU Standard Data Protection Clauses (pursuant to Article 46(2)(c) General Data Protection Regulation or “GDPR”), which the European Commission has assessed as providing an adequate level of protection for personal data (or other appropriate safeguards), to ensure that your data is protected adequately. (Should the UK no longer be part of the EEA, the EU Standard Data Protection Clauses will be recognized under applicable UK law as appropriate to safeguard transfers of personal data to T. Rowe Price entities outside of the UK or EEA.) You can ask for a copy of such appropriate safeguards by [contacting us](#).

## Your choices/your privacy rights

You have various rights in connection with our processing of your personal data, each of which is explained below. If you wish to exercise one or more of the below rights, please [contact us](#), and include your name, email and postal address as well as your specific request and any other information we may need in order to provide or otherwise process your request.

- **Access.** You may have the right to confirm with us whether your personal data is processed and, if it is, to request access to that personal data, including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others, though, so this is not an absolute right, and if you want to request more than one copy, we may charge a fee.
- **Rectification.** You may have the right to rectify inaccurate or incomplete personal data concerning you. In addition, where you have used an online portal to load your personal data, and where there is functionality that allows you to do so, you may access, review and update your personal data directly.
- **Deletion.** You may have the right to ask us to erase personal data concerning you, except that we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** In limited circumstances, you may have the right to request that we restrict processing of your personal data. This may apply where you believe such data to be inaccurate, that our processing is unlawful or that we no longer need to process such data for a particular purpose (but where we are

not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it). In such case, we would mark stored personal data with the aim of limiting particular processing for particular purposes in accordance with your request or otherwise restrict its processing.

- **Portability.** You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and you may have the right to transmit that data to another entity.
- **Objection.** Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling (profiling is not a standard practice, so when applicable) by us, and we can be required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision (when applicable) so that you can express your view and contest the decision.
- **Make a Complaint.** You also have the right to lodge a complaint with the competent data protection supervisory authority, which in Luxembourg is the Commission Nationale pour la Protection des Données (the “CNPD”) or in the UK is the Information Commissioner's Office (the “ICO”). If you are based in, or the issue you would like to complain about relates to, any other location, please [contact us](#).

## How long do we keep your personal data?

We will only retain your personal data for as long as it is necessary for the purpose for which those data were collected and to the extent permitted by applicable laws. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to promptly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

## Security

We have implemented technical and organisational security measures in an effort to safeguard personal data in our custody and control. Such measures that we have implemented include limiting access to personal data only to employees, contractors and authorised Service Providers who need to know such information for the purposes described in this Notice; training for our employees and contractors; and other technical, administrative and physical safeguards.

While we endeavour to always protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

## Changes to this Privacy Notice

This Notice is written in English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail. We reserve the right to change our Notice from time to time. If we decide to make a material change to our Notice, we will endeavour to make you aware of that fact by, for example, notifying you of these changes via email and/or posting an alert on the homepage of a relevant website and/or taking any further action as required by applicable law.

## Contact us

If you have concerns or questions regarding this Notice or if you would like to exercise your rights as a data subject, you can get in touch with the right person here: [International\\_HR@troweprice.com](mailto:International_HR@troweprice.com) or through the post at

# T.RowePrice®

International HR, T. Rowe Price, 60 Queen Victoria Street, London EC4N 4TZ. This Notice was last updated on 27 April 2020.