

OUR APPLICANT PRIVACY NOTICE

This Notice explains how Smiths Group uses personal data when you apply for a role with Smiths Group plc, John Crane or Flex-Tek. The Smiths entity recruiting for the role is the controller of your personal data. Applicants in Germany should also read Annex 1.

How to contact us

For questions, requests or complaints, contact the Office for Data Protection Compliance, Smiths Group plc, 10th Floor, Arbor, 255 Blackfriars Road, London SE1 9AX; telephone +44 (0)20 7004 1600; email dataprotection@smiths.com.

Personal data we collect and where it comes from

We may collect identification and contact details; application, CV, education and employment information; interview notes, assessments and communications; references and background-check information; and payment details where we reimburse recruitment expenses. We collect this information from you, recruitment providers, referees, former employers, public authorities and permitted background check providers.

Where permitted by law and relevant to the role, we may also process health or disability information, diversity information and criminal-offence information. We use sensitive information only where necessary and where an additional legal condition permits it.

Why we use your personal data

- To receive, administer and assess your application, communicate with you, arrange interviews and decide whether to offer employment.
- To verify information, obtain references and conduct lawful and proportionate background checks.
- To comply with employment, immigration, equality, regulatory and other legal obligations.
- To protect our systems, prevent fraud, establish or defend legal claims and improve our recruitment process.
- With your consent, where local law requires consent or where we wish to retain your details for future opportunities.

Our lawful bases are: taking steps at your request before entering an employment contract, compliance with legal obligations, our legitimate interests in operating an effective and secure recruitment process, and consent where appropriate. If we rely on legitimate interests, we balance those interests against your rights and freedoms. You may withdraw consent at any time without affecting earlier lawful processing.

You are not legally required to provide personal data, but we may be unable to consider your application if you do not provide information needed for the recruitment process. We do not use your personal data to make solely automated recruitment decisions, including profiling, that produce legal or similarly significant effects.

Sharing and international transfers

We may share relevant personal data with authorised Smiths personnel and group companies,

recruitment and technology providers, professional advisers, referees, background-check providers, regulators and public authorities. We require service providers to protect the information and use it only for authorised purposes.

- **Smiths Entities** – due to our corporate structure, we may transfer your data to other Smiths Group entities, in particular to (i) the Smiths entity at the headquarters for the Smiths Division to which you are applying, and (ii) Smiths Group Plc, who may collect, transfer and/or use the personal data we have collected from you for some or all of our Processing Activities. Where we share your personal information with other Smiths Group entities, they will use your information in a manner consistent with the purposes for which it was originally collected and consistent with this Applicant Privacy Statement and applicable data protection and privacy laws.
- **Our Data Processors** – we may share your personal data with our third-party service providers or with Smith Group entities who provide us with legal, event management, talent management, recruitment, communication and/or IT support services ("Data Processors"). To provide such services, our Data Processors process your personal data on our behalf. Our Data Processors have met our criteria as trusted guardians of personal data and are subject to contractual obligations to implement appropriate security measures to safeguard your personal data and to process personal data only as instructed by us.
- **Other Third Parties** – your personal data may also be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities) and independent external advisors (e.g., lawyers, auditors).

If we transfer your personal data from the UK or EEA to entities outside of the UK or EEA, to a country that is not officially recognized as providing an adequate level of data protection, we will apply safeguards to make sure that your data is being protected as required by applicable data protection law. This includes the most recent Standard Data Protection Clauses, the respective UK addendum, the UK International Data Transfer Agreement, each as applicable, and other safeguards that may be available. Where necessary, we also apply supplementary measures to ensure a sufficient level of data protection, taking account of the situation in the recipient country.

How long we keep your personal data

We retain applicant information only for as long as necessary for the recruitment process, legal or regulatory requirements, and the establishment or defence of claims, in accordance with our retention policy and applicable local law. If you agree that we may contact you about future roles, we will retain relevant details for the period explained when consent is requested. If you join Smiths, relevant recruitment records become part of your employment record.

Your rights

Depending on applicable law, you may ask us to provide access to your personal data, correct or delete it, restrict its use, object to processing, or provide certain data in a portable format. You may also withdraw consent and complain to the relevant data protection authority. These rights may be

subject to legal conditions and exemptions. Contact us using the details above to exercise a right.

Data protection complaints

You may complain about our handling of your personal data by email, post, telephone or any other reasonable contact method. We will acknowledge your complaint within 30 days, make appropriate enquiries without undue delay, keep you informed and tell you the outcome. If you remain dissatisfied, you may ask us to review the matter and complain to the UK Information Commissioner's Office or another relevant authority.

Security

We use appropriate technical and organisational measures to protect personal data against unauthorised access, loss, alteration or disclosure.

What should I do if I am not happy with how my information is being used?

You can contact us using the contact information above if you are not happy with how we are handling your personal data.

You also have the right to complain to our relevant supervisory authority, which is the Information Commissioner's Officer (ICO) in the UK, or to any other competent data protection supervisory authority. You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113

For applicants based in the European Union, contact details of data protection supervisory authorities can be found here: [Our members](#) | [European Data Protection Board](#)

Annex 1

This Annex 1 applies if you apply for a job with one of the German Smiths entities (e.g. John Crane GmbH or Hypertac GmbH). The German Smiths entity to which you apply is the controller of your personal data.

1. What personal data do you collect from me and use?

- a.) In deviation from the description in the main part of this Applicant Privacy Notice, the German Smiths entities do not collect the following personal data:
- health and medical data, such as information about your medical conditions, sickness absence and reasons for it, or mobility issues;
 - criminal records data, relating to any previous criminal convictions or as a result of a background criminal check; and
 - diversity and inclusion data, such as your racial origin, gender, religious background and/or sexual orientation.

We do not receive information about you directly from third parties such as government departments or current/former employers.

2. Why do you carry out these Processing Activities using my personal data? What are the legal bases to do so?

In deviation from the main part of this Applicant Privacy Notice, the German Smiths entities do not carry out background screenings. When we process your personal data, we rely on the following legal bases:

Processing Activities	Legal Basis
Administering and processing your application;	The processing is necessary to take steps at your request prior to and decide about the entering into an employment contract with you (Sec. 26(1) sentence 1 of the German Federal Data Protection Act (Bundesdatenschutzgesetz)).
Determining your eligibility for the role you applied for;	
	The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR). The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement.
Complying with applicable laws and employment-related requirements;	The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR). The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement.
Monitoring and ensuring compliance with applicable policies and procedures and laws;	
Communicating with you, Smiths employees and third parties, including informing you of future opportunities with Smiths	The processing is necessary to take steps at your request prior to and decide about the entering into an employment contract with you (Sec. 26(1) sentence 1 of the German Federal Data Protection Act (Bundesdatenschutzgesetz)). The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR). The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement. You consented to the processing of your personal data for these purposes (Art. 6(1)(a) GDPR)

Responding to and complying with requests and legal demands from regulators or other authorities;	The processing is necessary for compliance with a legal obligation to which we are subject (Art. 6(1)(c) GDPR).
Performance of our business, regulatory and legal obligations.	The processing is necessary for the purposes of the legitimate interests pursued by us or a Smiths Group entity (Art. 6(1)(f) GDPR) - as identified in the first column and in the main Privacy Statement.

3. For how long do you keep my personal data?

We keep your personal information for no longer than is necessary. In the event of a negative hiring decision, we will delete your personal data after six months, unless you have consented to a longer retention of your personal data for you to be considered for future job opportunities.