

PGA European Tour Privacy Notice for Job Candidates

PGA European Tour ("the Company"), "we", "us") has issued this Privacy Notice ("Notice") to job candidates this Notice may apply to ("you", "your"). This Notice sets out the personal information that we collect and process about you in connection with your application to join the Company (your "Application"), the purposes of such processing and the rights that you have in connection with the collection and processing of your personal data. Other privacy notices may also apply to you where you interact with the Company in other capacities (for example, as a visitor to the Company's website).

The Company takes your privacy seriously and we are committed to protecting your personal information and handling it in accordance with applicable law. If you are in any doubt regarding the applicable standards, or have any questions about this Notice, please contact DataProtection@europeantourgroup.com.

1. Types of personal information we collect about job candidates

- 1.1 In the course of your Application, we may process personal information about you and your family members and other individuals whose personal information has been provided to us.
- 1.2 The types of personal information we process include, but are not limited to:
 - 1.2.1 Identification data e.g., name, photograph, gender, date of birth, employee number;
 - 1.2.2 Contact details e.g., home address, telephone/email, emergency contact details;
 - 1.2.3 Employment details e.g., job title/position, office location, and holiday records;
 - 1.2.4 Professional qualifications achievements and skills information e.g., academic/professional qualifications, education, CV, languages;
 - 1.2.5 National identifiers e.g., national ID/passport, immigration status, driver's licence, social security numbers;
 - 1.2.6 Family members (or person nominated as next of kin) information – such as names, relationship to you, contact details;
 - 1.2.7 Financial information e.g., bank account details, tax information, salary and company allowances;
 - 1.2.8 Benefits and pension information e.g., employer pensions contributions, pension entitlements, retirement information (if applicable), life assurance and private medical cover information;
 - 1.2.9 Medical information, e.g. Medical Details disclosures, Occupational Health Assessments, fitness for work assessments, Covid-19 Testing
 - 1.2.10 Travel and accommodation information within and outside the UK for business;
 - 1.2.11 Health and safety information e.g., records of accidents at work, and
 - 1.2.12 Criminal records / Disclosure and Barring Service (DBS) checks.

2. Sources of personal information

Usually you will have provided the information we hold about you but there may be situations where we collect personal information from other sources. The following

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are the types of information we may collect about you and the source of the information:

- 2.1 References from nominated third party referees; and
- 2.2 Feedback from colleagues including managers and peers collected during performance conversations, development of any performance improvement plans and/or in the creation of any disciplinary records

3. Purposes for processing personal information

- 3.1 The Company collects and uses your personal information primarily for the purpose of managing your Application – for example, your employment contract and employment records (to manage your employment with us), your bank account and salary details (so we can pay you), medical information to aid risk assessments and Personal Emergency Evacuation Plans (PEEPs), and details of your dependents (for emergency contact and benefits purposes).
- 3.2 We may also collect and use personal information when it is necessary for other legitimate purposes, such as to help us conduct our business more effectively and efficiently – for example, for IT security/management, accounting purposes, or financial planning. We may also process your personal information to investigate breaches of law or of our own internal policies.
- 3.3 We may also use your personal information where we consider it necessary for complying with laws and regulations, including collecting and disclosing candidate personal information as required by law (e.g., for tax, health and safety, anti-discrimination laws), under judicial authorisation, or to exercise or defend the legal rights of the Company and its affiliate entities.

4. Monitoring

- 4.1 The Company will carry out automated monitoring of its IT and communications systems through automated tools such as anti-malware software, website filtering and spam filtering. It will also carry out monitoring of its physical premises, for example by using CCTV and security badges.
- 4.2 The primary purpose of this monitoring is to protect the Company, its employees, prospective employees, customers and business partners, for example:
 - 4.2.1 for general network operation and security, including in particular the security of the Company's IT systems and assets, and the optimal operation of its network and devices;
 - 4.2.2 for proof of business transactions and archiving;
 - 4.2.3 for coaching, training and evaluation of employees;
 - 4.2.4 for the protection of confidential information and intellectual property;
 - 4.2.5 for investigating breaches of internal policies, fraud or other unlawful or wrongful activity, or to respond to a particular personnel or company incident;
 - 4.2.6 for business continuity (such as monitoring business-related emails following an employee's departure); and
 - 4.2.7 for physical security of its premises.

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5. Who we share your personal information with

- 5.1 The Company takes care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the confidentiality and integrity of the information is maintained.
- 5.2 We will share your personal information with other members of the Company's group of companies (including other branches) around the world to administer human resources, as well as for other legitimate business purposes (such as IT services/security, tax & accounting purposes, general business management).
- 5.3 We make certain personal information available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data protection law.
- 5.4 We may also disclose personal information to other third parties on other lawful grounds, including:
 - 5.4.1 to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, or to meet national security or law enforcement requests, including, but not limited to, a subpoena or search warrant;
 - 5.4.2 with your consent;
 - 5.4.3 as necessary to establish, exercise or defend against potential, threatened or actual litigation;
 - 5.4.4 where necessary to protect the vital interests of another person; and
 - 5.4.5 in connection with the sale, assignment or other transfer of all or part of our business.

6. Transfer of your personal information outside of Europe

- 6.1 As the Company operates at a global level, we may need to transfer personal information to other countries. Transfers may also need to be made to other countries where we operate (such as information on relevant experience you may have for a particular job or secondment). When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws and legislation.
- 6.2 Likewise, when we use third party service providers and their services involve transfers of personal information outside of the European Economic Area or the United Kingdom, we ensure that the third-party service provider has appropriate data transfer mechanisms in place such as Standard Contractual Clauses to enable the transfer.

7. Retention policy

- 7.1 Personal information will be stored only as long as is necessary to carry out the purposes described in this Notice or as otherwise required by contractual agreements with third parties, law or other Company policies.

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7.2 Notwithstanding the above, the Company may retain your personal information for a minimum period of 12 months from the date you last logged into our recruitment portal.

8. Your rights as a data subject

8.1 At any point while we hold your personal information, you have a number of rights available to you, including the following:

8.1.1 Right of access – you have the right to access a copy of the information that we hold about you and to obtain information about how we process it;

8.1.2 Right of rectification – you have a right to request that we correct data that we hold about you if it is inaccurate or incomplete;

8.1.3 Right to be forgotten – in certain circumstances, you can ask for the data we hold about you to be erased from our records;

8.1.4 Right to restriction of processing – where certain conditions apply you have a right to request that we restrict the processing of your information;

8.1.5 Right of portability – you have the right to have the data we hold about you provided to you in an electronic format and/or to request that it is transferred to another organisation;

8.1.6 Right to object – you have the right to object to certain types of processing such as direct marketing; and

8.1.7 Right to object to automated processing – you also have the right not to be subject to a decision based solely on automated processing which adversely affects your legal rights.

8.2 If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time (by contacting us using the contact details set out in section 10 below). This will not however affect the lawfulness of the processing before your consent has been withdrawn.

8.3 You can exercise these rights in the first instance using the contact details set out in section 10 below. We will advise you promptly if we require further information in order to fulfil your request. Please be aware that these rights are, in the most part, not absolute and are subject to exceptions; for example if we have a necessary and lawful basis on which to continue processing your personal data, we may refuse your request to delete it.

9. Updates to this Notice

9.1 We may amend this Notice from time to time to keep it up to date with legal requirements, best practice and/or the way we operate our business. We will update this policy on the Candidate Home section of the corporate website and indicate at the end of the Notice when it was most recently updated. We encourage you to check back on this Notice periodically so that you are aware of the most recent version of it.

9.2 Where such changes will materially affect your privacy rights, we will also inform you about such changes via email.

10. Questions, comments and how to contact us

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- 10.1 In the first instance, you may wish to raise any general questions or concerns with your line manager.
- 10.2 Please address any questions or requests relating to this Notice to DataProtection@europeantourgroup.com, or alternatively by post to:
Data Protection Officer
European Tour
Wentworth Drive
Virginia Water
Surrey
GU25 4LX
- 10.3 You have a right to lodge any complaints with the Information Commissioner's Office although we ask that you raise any issues internally in the first instance with our Data Protection Officer at DataProtection@europeantourgroup.com.

Policy Owner: Legal / IT / HR

Date: August 2023