

# EU Job Applicant Notice

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## **INTRODUCTION**

PGIM, Inc. and its affiliates comprising Prudential's global asset management businesses (together, "PGIM," "we" or "us") value your trust and are committed to the responsible management, use, and protection of personal information. This Applicant Privacy Notice ("Notice") describes our practices regarding all personal information that we collect in connection with your application for a job or internship with PGIM. Personal information submitted elsewhere on PGIM's web sites will be used in accordance with our Global Online Privacy Statement located at [www.pgim.com/terms-use/privacy-center](http://www.pgim.com/terms-use/privacy-center).

## **ABOUT THIS NOTICE**

Some of the countries in which PGIM operates have laws related to the collection, use, transfer, and disclosure of the personal information of individuals and PGIM is committed to protecting the privacy of our current and potential associates. The purpose of this Notice is to give you information about what personal information we collect, use, transfer, and disclose, and why.

## **INFORMATION WE COLLECT**

### **INFORMATION YOU PROVIDE**

We may collect the following information from you regarding your application:

- First name, last name, address, telephone number, e-mail address, and other contact information;
- Work authorization status;
- CV, résumé, cover letter, previous work experience, skills, education information, title of qualifications and awards or any other information you elect to provide;
- LinkedIn profile, professional and other work-related licenses or memberships, permits and certifications held, and information relating to references;
- Reason for considering leaving current role; and
- Current salary/benefits, salary expectations, experience level in terms of leading teams, and notice period.

**NOTE:** We ask that you avoid submitting the following information which may qualify as sensitive information under applicable law, except where such information is legally required: information on race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic

or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings, and veteran status.

Any information you submit must be true, complete, and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

### **INFORMATION FROM OTHER SOURCES**

PGIM may obtain information about you from your references or from a background check report in connection with your application, as permitted by applicable law.

### **USE OF INFORMATION**

We collect and process information about you for the following reasons:

- a) Because you voluntarily provide this information;
- b) Because this information is necessary to take steps at your request prior to entering into an employment or internship;
- c) Because this information is of particular importance to us, and we have a specific legitimate interest under law to process it;
- d) To comply with a legal obligation; or
- e) Where necessary to protect the vital interests of any person.

Where the processing concerns information you voluntarily provided to us, or the processing is based on your consent, you may withdraw your consent at any time.

The information that you submit to PGIM will be used for PGIM's global personnel recruitment, management, and planning purposes, as permitted by local law, including:

- To process your application;
- To assess your capabilities and qualifications for a job;

- To conduct reference checks;
- To respond to your inquiries and communicate with you about your application;
- To comply with or monitor compliance with any applicable law or regulation;
- To conduct background checks if we offer you a position; and
- To preserve our other legitimate interests, for example, for PGIM's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within PGIM.

The information about you will be in a secured manner and may be used to consider you for opportunities at PGIM other than the one(s) for which you apply. If you do not wish us to do this, please contact [PGIMHR@pgim.com](mailto:PGIMHR@pgim.com). If we hire you, personal information we collect in connection with your application may be incorporated into our human resources system and may be used to manage the new-hire process; any such information may become part of your employee file and may be used for other employment-related purposes.

PGIM may also use the information as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

However, if you do not provide sufficient information, PGIM may be unable to consider your employment application.

## **DISCLOSURE OF PERSONAL INFORMATION**

PGIM may share personal information with affiliates that are involved in evaluating candidates for a given position. PGIM will remain responsible for personal information that is jointly used with affiliates. We will make the information available to personnel with a business need to know the information, including personnel in the recruiting, human resources, information technology departments, and in the department responsible for the position for which you are applying.

PGIM may share personal information with our third-party service providers who provide services such as recruiting assistance, background check processing, and similar services.

PGIM also may share personal information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

PGIM may transfer information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Disclosing your personal information may include transferring personal information to other countries (including countries other than where you are based that have a different data protection regime than is found in the country where you are based). If you are located in the European Economic Area (“EEA”) this may include countries outside of the EEA. A list of the affiliate companies that may jointly process your personal information is available upon request (please refer to the ‘Contact Us’ section at the end of this Notice). Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available at: [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)). As for transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your information. You may obtain a copy of these measures by contacting PGIMHR@pgim.com.

## **DATA RETENTION**

We will retain personal information for the period necessary to fulfil the purposes outlined in this Notice unless a longer retention period is required or permitted by applicable law. We may also retain your information for the purpose of considering whether your skills are suitable for other opportunities. If you do not wish us to do this, please contact PGIMHR@pgim.com. We may remove personal information for inactive accounts from our records, subject to any applicable legal or regulatory obligations. Furthermore, PGIM may delete personal information about you (including your CV/résumé) from our records at any time and without providing any reason. Therefore, please retain your own copy of the personal information provided to us.

## **SECURITY**

We seek to use reasonable organizational, technical, and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the “*Contact Us*” section below.

**Please do not send sensitive information to us via email.** It is your sole responsibility to use the appropriate level of care whenever you communicate with us.

PGIM hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered, or destroyed.

## **DIVERSITY**

PGIM is an equal opportunity employer, which means we offer equal treatment to all applicants. PGIM does not discriminate, either directly or indirectly, on the grounds of race, colour, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status, or genetic information in any area of recruitment. In some countries we ask for information on the ethnic origin, gender, and disability of our applicants for the purpose of monitoring equal opportunity. If you have a disability and would like to indicate as part of your application any relevant effects of your disability and any adjustment which you consider should reasonably be made to the process to assist your application, you are encouraged to disclose this during the application process.

## **USE OF APPLICATION SERVICES BY MINORS**

The job and/or internship application services (the “Services”) are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Information from individuals under eighteen (18).

## **CURRENT PERSONNEL OF PGIM**

If you currently work for PGIM or one of our affiliates, you must be eligible to apply for a different position within PGIM. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the HR manager for the new position concerning application eligibility, benefit programs,

and HR policies applicable to that position.

## **CHANGES TO THE NOTICE**

We may update this Notice to reflect changes in the way we process Personal Information. We will notify you about such changes in the way we use your Personal Information in compliance with applicable law. You can determine when the Notice was revised by referring to the "Last Updated" legend on the top of this Notice. By continuing to use these Services, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Notice, in whole or part, you can choose to not continue to apply for the job.

## **ACCESS AND CORRECTION**

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Information, object to the processing of Personal Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (in each case, to the extent these rights are provided to you by applicable law), you may submit the applicable request form online [here \(www.pgim.com/terms-use/privacy-center\)](http://www.pgim.com/terms-use/privacy-center) or contact us phone at +1-844-PRU-DSAR (+1-844-778-3727), by sending an e-mail to [pgim.privacy@pgim.com](mailto:pgim.privacy@pgim.com), or write to us at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed or suppressed from our database, as applicable. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request (or include in the webform, letter, or call details), and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes, to meet legal obligations, and/or to complete any transactions that you began prior to requesting a change or deletion.

You always have the right to lodge a complaint with a Data Protection Authority for your country or region or in the place of the alleged misconduct.

## **CONTACT US**

If you have recruitment questions or requests, please contact us at [PGIMHR@pgim.com](mailto:PGIMHR@pgim.com).

For any Privacy related matters, please contact us at [pgim.privacy@pgim.com](mailto:pgim.privacy@pgim.com) with your questions or comments or write to us at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request in accordance with applicable law.

## **ADDITIONAL INFORMATION REGARDING THE UK AND EEA**

You may also:

- Contact our data protection officer (DPO) with questions about this privacy notice or our privacy practices. The contact information for our DPO in Germany is as follows:

Jochen Geck  
VIVACIS Consulting GmbH  
Horexstraße 1 | ALTER GÜTERBAHNHOF  
D - 61352 Bad Homburg  
Telephone: +49 160 938 492 30  
Email: [jochen.geck@vivacis.de](mailto:jochen.geck@vivacis.de)

- Lodge a complaint with an EU/EEA or the UK data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities in the EU/EEA is available at [HTTPS://EDPB.EUROPA.EU/ABOUT-EDPB/ABOUT-EDPB/MEMBERS\\_EN](https://edpb.europa.eu/about-edpb/about-edpb/members_en) and information regarding lodging a complaint with the UK ICO can be found here: <https://ico.org.uk/make-a-complaint/>

## **ACKNOWLEDGEMENT**

By submitting my application, I certify that I have reviewed and understand this Notice as outlined above.