

EDRINGTON



OUR PEOPLE RECRUITMENT PRIVACY POLICY

Last Updated 17 August 2023

The Edrington Group Limited is a private limited company (registered in Scotland No.SC036374), and our registered office is at 100 Queen Street, Glasgow, G1 3DN. Processing of personal data relating to Edrington's recruitment process as described in this privacy policy is undertaken by Highland Distillers Limited and Edrington Distillers Limited, as well as other group companies of The Edrington Group Limited where relevant – details of these companies can be found in Appendix A.

In this privacy policy, The Edrington Group Limited and the relevant Edrington group companies are referred to as **Edrington, we, us** or **our**. Edrington is the data controller in relation to the processing of your personal data described in this privacy policy.

Edrington is committed to safeguarding the privacy of the personal data that we hold concerning our prospective, current and former employees ("you" or "people") for management, human resources and payroll purposes. If you are successful in your application to work at Edrington your personal data will continue to be used by Edrington and we will provide you with our employee privacy policy when you start.

We have appointed a Group Data Privacy Manager. If you have any questions about this privacy policy or how we handle your personal data, please contact us at dataprotection@edrington.com.

Personal data collected

In this privacy policy, 'your personal data' means information about you from which you can be identified. Appendix B lists your personal data that we may process as part of our recruitment process. This does not include data where your identity has been removed (anonymous data).

Collection of personal data

The personal data is either (a) provided by you, (b) obtained from third parties, (normally through the application and recruitment process), or (c) created by us in the course of job-related activities during your employment/engagement with us. Data may be obtained from the following third parties (former employers, employment agencies, recruitment agencies, credit reference agencies or other background check agencies).

It is important that your personal data is accurate and up to date. Please keep us informed if your personal data changes during the recruitment process.

Information about criminal convictions

We will only collect personal data about criminal convictions via background screening if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you.

We will use information about criminal convictions and offences in the following ways (1) where it is necessary to protect your interests, our interests and those of other employees or to protect clients and other third parties from theft, fraud and similar risks; and (2) where it is necessary in relation to legal claims. We may use your personal data in this way where it is necessary to carry out our employment rights and obligations and in accordance with our data protection policy.



Processing your personal data

Depending on your residence, we may process your personal information based on your consent, any of the following lawful basis or other lawful bases in accordance with applicable law. Appendix B details our lawful bases for processing your personal data.

Our purpose for processing your personal data is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process. In general, we process your personal data to:

- Carry out background and reference checks, where applicable;
- Determine the terms of which you may work for us, and advise you of these;
- Check you are legally entitled to work in the country where you have applied for a role;
- Contact you;
- Carry out an interview with you, which may be by video;
- Make decisions about salary and compensation;
- Assess qualifications and suitability for a job or task;
- Manage flexible working applications;
- Consider reasonable adjustments, where relevant;
- Carry out education, training and development;
- Carry out equal opportunities monitoring;
- Comply with health and safety obligations;
- Establish, exercise or defend legal claims; and/or
- Comply with the law or requirements of a regulator.

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

Personal data necessary for the contract / statutory requirements

Appendix B sets out your personal data that is necessary for us to enter into a contract with you. If you don't provide this data, we may not be able to enter into the contract. For example, if you don't provide us with your bank details, we may not be able to pay you.

In some circumstances, the provision of your personal data is a statutory requirement. This includes:

- Documentation confirming your right to work in the country where you have applied for a job – if you don't provide this, we may not be able to enter into a contract with you;
- Statutory information you must provide to us if you wish to claim any statutory payments – if you don't provide this, we may not be able to comply with our legal obligations and/or provide relevant benefits to you; and/or
- Information required for us to carry out background screening where this is relevant to your role – if you don't provide this, we may not be able to carry out such screening and/or enter into a contract with you.

What are your rights?

You have a number of rights under the data protection laws in relation to the way we process your personal data, namely:

- **Access:** you can request to access your personal data held by us;
- **Rectification:** you can ask us to correct your personal data if it is inaccurate or incomplete;
- **Erasure:** in certain circumstances, to have your personal data deleted or removed;

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- **Restriction:** in certain circumstances, to restrict the processing of your personal data;
- **Objection:** in certain circumstances, to object to the processing of your personal data where we are relying on a legitimate interest on the basis of your particular situation. We will only then continue the processing if we have overriding legitimate grounds for this, or the processing is to establish, exercise or defend legal claims;
- **Portability:** a right of data portability, namely to obtain and reuse your personal data for your own purposes across different services;
- **Automated decision-making:** not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you; and
- **Compensation:** to claim compensation for damages caused by a breach of the data protection laws.

If you wish to exercise any of these rights, please email dataprotection@edrington.com.

Please note that we may be unable to delete or remove your personal data which we need as part of your employment with Edrington.

Who do we share your personal data with?

We will share your personal data with other employees and companies in our group for administrative, management and accounting purposes, and as part of our regular reporting activities on company performances, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

To effectively fulfil our obligations to you, including managing our recruitment process, and to provide you with certain benefits, we use a number of trusted and reliable third parties to carry out functions which involve the processing of your personal data such as pre-employment screening providers, video interview providers and psychometric assessment providers. We also use an online application system to process your personal data as part of the recruitment process.

When sharing your personal data in the above circumstances, we will also fulfil other statutory obligations as may be required by the applicable laws, such as informing you of the details of the receivers and obtaining your separate consent.

Where is your personal data stored?

Edrington is a global company with our headquarters based in the UK and so your personal data will most likely be stored in the UK, which will involve a transfer of personal data to the UK if you are based in another country.

We may transfer your personal information outside of the UK for the purposes listed above. There is either: (1) an adequacy decision under data protection law in respect of that country, meaning that it is deemed to provide an adequate level of protection for your personal information; or (2) we have put in place the following measures to ensure that your personal information receives adequate protection: intra-group contractual safeguards and a process for assessing and maintaining the security and integrity of IT systems used across the Edrington Group. You can access a copy of these by contacting us at the details below.

How long do we keep your personal data for?

We strive to only keep your personal data for so long as is necessary, in connection with the purpose for which we collected the personal data.

If you are unsuccessful with your application, we will retain your personal data for six months and thereafter delete it. If you are successful, your personal data will be retained in accordance with our data retention policy

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during your engagement and for seven years after termination, unless we have a legal requirement to retain this data for longer. You can also delete your profile at any time by selecting the Delete Profile option through the recruitment platform.

Questions

If you have any questions about the way in which your personal data is processed, please contact us at dataprotection@edrington.com.

Complaints

If you have applied for a role in the UK, you have the right to complain about data protection matters to the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113.

You can also lodge a complaint with a data protection regulator in the jurisdiction in which you are based. For example:

- If you are based in South Africa, you have the right to contact the information regulator to lodge a complaint through its website [here](#). The information regulator can be contacted by calling 010 023 5200;
- If you are based in France, you have the right to complain about data protection matters to the CNIL, which is the French supervisory authority for data protection issues; and
- If you are based in Sweden, you have the right to complain to Sw. Integritetsskyddsmyndigheten, which is Sweden's supervisory authority for data protection issues.

We would however appreciate the chance to discuss and work with you to address your concerns before you approach the ICO or another regulator, so please contact us in the first instance.

Security

We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorised person accessing it.

Changes

This policy will be changed from time to time. If we change anything important about this privacy policy (the information we collect, how we use it or why) we will notify you.



Appendix A: The Edrington Group Companies

The table includes details of The Edrington Group's entities which process personal data relating to Edrington's recruitment process as described in the recruitment privacy policy. If you have any queries regarding the processing of your personal data please contact Edrington at dataprotection@edrington.com.

Company	Registered Address	Location of Registration
The Edrington Group Limited	100 Queen Street, Glasgow, G1 3DN	Scotland
Highland Distillers Limited	100 Queen Street, Glasgow, G1 3DN	Scotland
Edrington Distillers Limited	100 Queen Street, Glasgow, G1 3DN	Scotland
The Macallan Distillers Limited	The Macallan Distillery, Craigellachie, Banffshire, AB38 9RX	Scotland
Brugal & Co S.A.	Brugal & Co., S.A. is Carretera Luperón km 3 1/2, Puerto Plata	Dominican Republic
Casa Brugal RD, S.A.	Casa Brugal RD, S.A. is Avenida Núñez de Cáceres esq. Rómulo Betancourt, Downtown Business Tower, piso 11, Santo Domingo, Distrito Nacional.	Dominican Republic
Edrington Shanghai Limited	Unit 1, 19/F, Tower 1, Grand Gateway, No.1 Hong Qiao Road, Shanghai, PR China	People's Republic of China
Edrington Hong Kong Limited	Suite 1207-07 Exchange Tower, 33 Wang Chiu Road, Kowloon Bay, Hong Kong	Hong Kong
Edrington Singapore Pte Ltd	12 Marina View, Asia Square Tower 2, #24-01, Singapore 018961	Singapore
Edrington Taiwan Ltd	9F, No. 9 Songgao Road, Xinyi Dist., Taipei 110, Taiwan	Taiwan
Edrington (M) SDN BHD	16-02, Tower A, Vertical Business Suite, Bangsar South, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia	Malaysia
Edrington Middle East & Africa Ltd	4 Megalou Alexandrou Street, Aglantzia, 2121 Nicosia, Cyprus	Cyprus
Edrington Group, USA, LLC.	18 West 24 th Street, 4th Floor, New York, NY 10010, USA	Delaware, USA
Edrington Mexico, S.A. DE C.V	Paseo de los Tamarindos 90, Piso 18, Ofic 113, FIC 113, Bosques de las Lomas, 05120 Cuajimalpa de Morelos, Ciudad de Mexico.	Mexico
Maxxium Nederlands	De Cuserstraat 89 Amsterdam, 1081 CN Netherlands	The Netherlands
Maxxium BeLux	0770.344.997, Leuvensesteenweg 643 - 1930 Zaventem	Belguim
Edrington UK Distribution Limited	191 West George Street, Glasgow, G2 2LD	Scotland

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Company	Registered Address	Location of Registration
Edrington Africa	3021 William Nicol Drive, Block A, Ground Floor, Bryanston 2191, Johannesburg, South Africa	South Africa
Edrington Demark A/S	Dronningens Tvaergade 9, 1302 Copenhagen, Denmark.	Denmark
Edrington Sweden AB	Luntmakargatan 46, Box 5341, 102 47 Stockholm, Sweden	Sweden
Edrington Norway AS	Rådhusgata 30b, 0151 Oslo	Norway
Edrington Finland OY	Firdonkatu 2 T 144, 00520 Helsinki	Finland
Edrington European Travel Retail Limited	100 Queen Street, Glasgow, G1 3DN	Scotland

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Appendix B: Personal Data

Data marked * in the table below is 'special categories of personal data' or might disclose such information. We must have additional legal bases for processing special categories of personal data – these are listed in the right column of the table.

Your personal data	Reason for processing personal data	Legal basis for processing
<ul style="list-style-type: none"> • Personal contact details (name, address, telephone number, email address, LinkedIn profile) • Application form, CV and interview notes • Correspondence and results regarding background checks • References and details of previous employers • Industry, notice period, salary expectations • Professional memberships and qualifications • Identity documents • Offer letter and contract • Work location • Start date • Flexible working arrangements • Criminal convictions and offences* • Tax and national insurance details, including national insurance number • Veteran status (US based candidates only) 	<p>Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work.</p> <p>Carry out background and reference checks, where applicable.</p> <p>Determine the terms on which you work for us and advise you of these.</p> <p>Make decisions about salary and compensation.</p>	<p>To enter into a contract with you</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • to select suitable employees, workers and contractors. <p><u>*For special categories:</u></p> <ul style="list-style-type: none"> • to perform or exercise legal obligations imposed on us by law in connection with employment.
<ul style="list-style-type: none"> • Legal gender • Health data, including disability information* • Diversity data, including ethnicity, gender identity and sexual orientation (only where specifically requested)* 	<p>Considering and implementing reasonable adjustments.</p> <p>Comply with pay gap reporting obligations.</p> <p>Monitoring diversity, equity and inclusion.</p>	<p>To comply with a legal requirement.</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • to review equality of opportunity or treatment. <p><u>*For special categories:</u></p> <ul style="list-style-type: none"> • to review equality of opportunity or treatment; • to perform or exercise legal obligations imposed on us by law in connection with employment; and • with your explicit consent.