



## OUR PEOPLE RECRUITMENT PRIVACY POLICY – USA

**Last Updated 26 September 2023**

The Edrington Group USA, LLC dba Edrington Americas, is a New York limited liability company, with its principal place of business at 18 W 24th St., 4th Floor, New York, NY 10010. Processing of personal information relating to our recruitment process as described in this privacy policy is undertaken by Edrington Americas and its ultimate parent company, The Edrington Group Limited, a private limited company (registered in Scotland No.SC036374), with its registered office at 100 Queen Street, Glasgow, G1 3DN, as well as other group companies, where relevant – details of these companies can be found [here](#).

In this privacy policy, Edrington Americas 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 information described in this privacy policy.

Edrington is committed to safeguarding the privacy of the personal information 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 information 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 information, please contact us at [dataprotection@edrington.com](mailto:dataprotection@edrington.com).

### **Personal information collected**

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

If you are based in California, Appendix C lists the categories of personal information that we process.

### Collection of personal information

The personal information 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 with us. Information 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 information is accurate and up to date. Please keep us informed if your personal information changes during the recruitment process.

### Information about criminal convictions

We will only collect personal information 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 offenses 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

# EDRINGTON



from theft, fraud and similar risks; and (2) where it is necessary in relation to legal claims. We may use your personal information 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 information**

Our purpose for processing your personal information 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 information to:

- Carry out background and reference checks, where applicable;
- Determine the terms of which you may work for us, and advise you of these, which include your position, start date, duration of employment, office location, salary, salary review date and eligibility for a mobile allowance, bonus, holidays, sick leave, 401K plan and medical insurance;
- 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 accommodations, 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 information necessary for the contract / statutory requirements**

Appendix B sets out your personal information that is necessary for us to offer you employment. If you don't provide this information, we may not be able to employ you. 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 information 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 employ 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 employ you.

## **What are your rights?**

You have a number of rights under the California privacy laws where you are resident in California in relation to the way we process your personal information, namely:

- **Access:** you can request to access your personal information;

# EDRINGTON



- **Deletion:** you can request that we delete your personal information, subject to some exceptions under applicable law;
- **Correction:** you can request that we correct any inaccuracies in your personal information; and
- **Portability:** you can request a copy of your personal information in a portable format.

If you wish to exercise any of these rights, please email to [dataprotection@edrington.com](mailto:dataprotection@edrington.com) or call 1844 677 4154. We will not discriminate or retaliate against you for exercising such a right under the California privacy laws.

We will verify and respond to your request in accordance with applicable law within 10 business days. We may need additional information to verify your request. Please note that we may be unable to delete or remove your personal information which we need as part of your employment with Edrington.

## **Who do we share your personal information with?**

We will share your personal information 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 information.

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 information, such as pre-employment screening providers, video interview providers and psychometric assessment providers. We also use an online application system to process your personal information as part of the recruitment process.

When sharing your personal information 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 information stored?**

Edrington is a global company with our headquarters based in the UK and so your personal information will most likely be transferred outside of the US and stored in the UK.

We may transfer your personal information to the US 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 information for?**

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

If you are unsuccessful with your application, we will retain your personal information for six months and thereafter delete it. If you are successful, your personal information will be retained in accordance with our data retention policy during your engagement and for seven years after termination, unless we have a legal requirement to retain this information for longer. You can also delete your profile at any time by selecting the 'Delete Profile' option through our recruitment platform.

# EDRINGTON



## **Questions**

If you have any questions about the way in which your personal information is processed, please contact us at [dataprotection@edrington.com](mailto:dataprotection@edrington.com).

## **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.

# EDRINGTON



## Appendix A: The Edrington Group Companies

The table includes details of The Edrington Group's entities which process personal information relating to Edrington's recruitment process as described in the recruitment privacy policy. If you have any queries regarding the processing of your personal information please contact Edrington at [dataprotection@edrington.com](mailto: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 <sup>th</sup> Street, 4th Floor, New York, NY 10010, USA	New York, 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

# EDRINGTON



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

# EDRINGTON



## Appendix B: Personal Data

Data marked \* in the table below is 'sensitive personal information' or might disclose such information.

Your personal data	Reason for processing personal data
<ul style="list-style-type: none"> <li>• Personal contact details (name, address, telephone number, email address, LinkedIn profile)</li> <li>• Application form, CV and interview notes</li> <li>• Correspondence and results regarding background checks</li> <li>• References and details of previous employers</li> <li>• Industry, notice period, salary expectations</li> <li>• Professional memberships and qualifications</li> <li>• Identity documents</li> <li>• Offer letter</li> <li>• Work location</li> <li>• Start date</li> <li>• Flexible working arrangements</li> <li>• Criminal convictions and offences*</li> <li>• Tax details</li> <li>• Veteran status</li> </ul>	<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>
<ul style="list-style-type: none"> <li>• Legal gender</li> <li>• Health data, including disability information*</li> <li>• Diversity data, including ethnicity, gender identity and sexual orientation (only where specifically requested)*</li> </ul>	<p>Considering and implementing reasonable adjustments.</p> <p>Comply with gender pay gap reporting obligations.</p> <p>Monitoring diversity, equity and inclusion.</p>

# EDRINGTON



## Appendix C: California Privacy Law Appendix

This appendix provides additional information to residents of California and supplements the information provided in the recruitment privacy policy above.

To learn more about the categories of personal information we collect, how we collect it, why it is collected, with whom we share the information, and how long we retain it, please see the chart below.

Category	What we collect	How we collect it	Why we collect it	With whom we share it	How long we retain it
<b>Identifiers and contact information</b>	Name, mailing address, email address, phone number, LinkedIn profile, identity documents and other contact information.  For more information please see the <a href="#">Personal Information Collected</a> section above.	Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.  For more information please see the <a href="#">Personal Information Collected</a> section above.	We collect this information for the purposes listed in the <a href="#">Processing Your Personal Information</a> section above.	Shared with our affiliates, partners, vendors, and service providers as described in the <a href="#">Who Do We Share Your Personal Information With</a> section above.	We retain information as described in the <a href="#">How Long Do We Keep Your Personal Information</a> section above.
<b>Protected classification characteristics under California or federal law</b>	Age, legal gender, health data (including disability information) and diversity data (including ethnicity, gender identity and sexual orientation, only where specifically requested).  For more information please see the <a href="#">Personal Information Collected</a> section above.	Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.  For more information please see the <a href="#">Personal Information Collected</a> section above.	We collect this information for the purposes listed in the <a href="#">Processing Your Personal Information</a> section above.	Shared with our affiliates, partners, vendors, and service providers as described in the <a href="#">Who Do We Share Your Personal Information With</a> section above.	We retain information as described in the <a href="#">How Long Do We Keep Your Personal Information</a> section above.



# EDRINGTON



Category	What we collect	How we collect it	Why we collect it	With whom we share it	How long we retain it
<b>Commercial information</b>	Tax information and social security number.  For more information please see the <a href="#">Personal Information Collected</a> section above.	Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.  For more information please see the <a href="#">Personal Information Collected</a> section above.	We collect this information for the purposes listed in the <a href="#">Processing Your Personal Information</a> section above.	Shared with our affiliates, partners, vendors, and service providers as described in the <a href="#">Who Do We Share Your Personal Information With</a> section above.	We retain information as described in the <a href="#">How Long Do We Keep Your Personal Information</a> section above.
<b>Biometric information</b>	Not collected	N/A	N/A	N/A	N/A
<b>Internet or other similar network activity</b>	IP address, browser type and version, browser plug-in types and versions, operating system and platform, device type and device identifiers  For more information please see the <a href="#">Personal Information Collected</a> section above.	Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.  For more information please see the <a href="#">Personal Information Collected</a> section above.	We collect this information for the purposes listed in the <a href="#">Processing Your Personal Information</a> section above.	Shared with our affiliates, partners, vendors, and service providers as described in the <a href="#">Who Do We Share Your Personal Information With</a> section above.	We retain information as described in the <a href="#">How Long Do We Keep Your Personal Information</a> section above.
<b>Geolocation data</b>	Not collected.	N/A	N/A	N/A	N/A
<b>Sensory data</b>	Not collected.	N/A	N/A	N/A	N/A
<b>Professional or employment-related information</b>	Application form, CV, References and details of previous employers, professional memberships and	Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.	We collect this information for the purposes listed in the <a href="#">Processing Your Personal Information</a> section above.	Shared with our affiliates, partners, vendors, and service providers as described in the	We retain information as described in the <a href="#">How Long Do We Keep Your Personal Information</a>

# EDRINGTON



Category	What we collect	How we collect it	Why we collect it	With whom we share it	How long we retain it
	<p>qualifications, industry, work location, start date and veteran status.</p> <p>For more information please see the <a href="#">Personal Information Collected</a> section above.</p>	<p>For more information please see the <a href="#">Personal Information Collected</a> section above.</p>		<p><a href="#">Who Do We Share Your Personal Information With</a> section above.</p>	<p><a href="#">Information</a> section above.</p>
<b>Non-public education information</b>	<p>Interview notes, correspondence and results regarding background checks, notice period, salary expectations, flexible working arrangements, offer letter and contract.</p> <p>For more information please see the <a href="#">Personal Information Collected</a> section above.</p>	<p>Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.</p> <p>For more information please see the <a href="#">Personal Information Collected</a> section above.</p>	<p>We collect this information for the purposes listed in the <a href="#">Processing Your Personal Information</a> section above.</p>	<p>Shared with our affiliates, partners, vendors, and service providers as described in the <a href="#">Who Do We Share Your Personal Information With</a> section above.</p>	<p>We retain information as described in the <a href="#">How Long Do We Keep Your Personal Information</a> section above.</p>
<b>Inferences drawn from other personal information</b>	<p>Information generated from your use of our recruitment system and application process.</p> <p>For more information please see the <a href="#">Personal Information</a></p>	<p>Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.</p> <p>For more information please see the <a href="#">Personal Information Collected</a> section above.</p>	<p>We collect this information for the purposes listed in the <a href="#">Processing Your Personal Information</a> section above.</p>	<p>Shared with our affiliates, partners, vendors, and service providers as described in the <a href="#">Who Do We Share Your Personal Information With</a> section above.</p>	<p>We retain information as described in the <a href="#">How Long Do We Keep Your Personal Information</a> section above.</p>

# EDRINGTON



Category	What we collect	How we collect it	Why we collect it	With whom we share it	How long we retain it
	<u>Collected</u> section above.				
<b>Sensitive personal information</b>	<p>Right to work status and diversity data (including ethnicity, gender identity and sexual orientation, only where specifically requested).</p> <p>For more information please see the <u>Personal Information Collected</u> section above.</p>	<p>Collected online or offline when you provide it to us, through your use of our recruitment system or from third parties.</p> <p>For more information please see the <u>Personal Information Collected</u> section above.</p>	<p>We collect this information for the purposes listed in the <u>Processing Your Personal Information</u> section above.</p>	<p>Shared with our affiliates, partners, vendors, and service providers as described in the <u>Who Do We Share Your Personal Information With</u> section above.</p>	<p>We retain information as described in the <u>How Long Do We Keep Your Personal Information</u> section above.</p>