

Recruitment Data Privacy Policy

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Policy owner: Head of HR

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1. Purpose

This Recruitment Data Privacy Policy explains how Swire Bulk Holdings Pte Ltd and all its subsidiaries (hereinafter collectively referred to as the "the Company", "we" or "us") manages the personal data for job applicants.

2. Policy Statement

The Company respects and safeguards the privacy of all job applicants. This Recruitment Data Privacy Policy sets out the key principles regarding how the personal data of job applicants will be managed.

3. Application

This Policy only applies to the personal data of job applicants and potential candidates for employment. It does not apply to our employees, contractors or clients, or other personal data that the SB Group collects for other purposes.

Each SB Group company acts as the data controller for personal data collected for its own recruitment purposes.

4. Definitions

Acronyms	Description
Personal Data	Means any information (e.g. names, contact detail, passport number, biometric data, health data etc) relating to an identified or identifiable natural person (e.g. customer, employee etc).

5. Policy Details

5.1 Personal Data we collect

Your personal data is processed by the Company. Generally, the Company will only collect personal data in the recruitment process that is necessary to assess you for the position for which you have applied. The Company that you apply to will be the Data Controller of that personal data.

By giving your consent, you agree to your personal data being used in conjunction with the recruitment and employment purposes. To maximise your opportunities to work with us, you are encouraged to keep the information always provided to us up to date. You are responsible for ensuring that the personal data is correct and true.

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As part of your recruitment process, we may collect the following personal data about you (whether such information is provided by you or a third party):

PERSONAL DATA collected	LEGAL GROUNDS of processing
<p>Personal information such as:</p> <ul style="list-style-type: none"> • Your name, address and contact details • Your nationality, racial or ethnic origin (where the processing is required to comply with local law), date of birth, marital status, place of residence, religion (if applicable) • Social security number, passport number, visa, permission to work documentation or other national identification numbers. <p>Prior work experience information such as:</p> <ul style="list-style-type: none"> • CV, application form details • Employment history, reference information and/or information received from background checks (where applicable). • Such information may be provided to us by third parties e.g. recruiters. • Professional qualifications, licenses, and training certificates. • Education history and transcripts. • Health data, while we do not generally collect your health data for recruitment purposes, where required or permitted by local law to assess your fitness to work, we will process your health data strictly for such purpose only. • Insofar as permitted by law, information received relating to criminal records or financial probity checks or other independent searches (and where we do so you will be asked to consent to such collection and use before we or agents undertake the search). • Information collected automatically when you apply for a job through our website using cookies and other similar technologies. For more information, please refer to the Company Cookies Policy. 	<ul style="list-style-type: none"> a) The processing is necessary to perform an agreement we already have with you or to take steps to enter into an agreement with you (e.g. a contract of employment) b) For our legitimate business interests (where we have considered these are not overridden by your rights). c) To comply with applicable laws, regulations, legal processes or governmental requests - these may include but are not limited to minimum age labour laws, local content or employment requirements <p>With your consent - where none of the above legal basis applies, we will process your Personal Data based on your explicit written consent. If so, we will provide you with the full details of the information that we would require and the reason we need it, so that you can carefully consider whether you wish to consent. You have the right to withdraw your consent at any time and this will not affect the validity of our processing of your Personal Data prior to your withdrawal of consent.</p>

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PERSONAL DATA collected	LEGAL GROUNDS of processing
<ul style="list-style-type: none"> Materials produced during recruitment processing, including any video and presentations you provide us for the purposes of a recruitment assessment and information from interview notes (whether made by you or the interviewer) 	

If you fail to provide the personal data requested, in some circumstances this may mean that we are unable to process your application.

5.2 How we collect information about you

Generally, we collect your personal data either a) directly from you when submit a job application or CV to us or b) from third parties with whom you have registered an interest in working for the Company (e.g. from recruitment agencies). The personal data held by us relating to your personal data will be strictly confidential.

In considering your application we may collect information from third parties such as our business partners, employment agencies, past employers, referees that you specify, educational institutions, credit reference agencies, other background check agencies, sanctions and politically exposed person screening lists or public registers, publicly available sources ("**Social Network Sites**") if you choose to provide us with a link to your profile on any Social Network Site as part of your job application.

We may also obtain your contact details from publicly available sources to make initial contact with you for recruitment purposes. If we contact you in this way, you will be given the opportunity to opt-out of receiving any further information about career opportunities with the SB Group and you can subsequently opt-out at any time by contacting the Company's Data Protection Officer by emailing DataProtection@swirebulk.com.

If you give us information about other individuals - for example, referees - or you are providing information about applicants to us in your capacity as a recruitment agency, you must first make sure that the individual knows that you might disclose information about them (either specifically to us or, at least, to potential employers) and you have obtained all relevant written consents from that individual to do so on their behalf. You are required to either confirm or to provide us with copies of all relevant written consents from that individual to do so on their behalf when requested.

If you are a recruitment agency you should make sure that our Recruitment Data Privacy Policy is communicated to the applicant and all relevant written consents from the applicant had been obtained before sending the CV of the applicant to the Company.

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5.3 What we do with the information we gather

Your personal data will be processed for the purposes of:

- Verifying and processing your application and evaluating your suitability for employment in any current or prospective position with us
- Carrying out due diligence or employment screening activities including but not limited to reference checks in accordance with legal or regulatory obligations or risk management procedures that may be required by law or put in place by us;
- Contacting or communicating with you for the purposes of processing your employment application, administrative information and other employment opportunities and
- Purposes reasonably related to any of the above

5.4 Sharing your information

We permit our authorised third-party service providers and the Company's other offices to use your personal data on our behalf for the purposes as set out in above. Where reasonably necessary or required to do so by law, we may disclose your personal data to third parties in response to a legitimate request for assistance by law enforcement or regulatory investigations, to protect your vital interests or safety and to seek legal advice from the Company's external lawyers or in connection with litigation with a third party.

Sometimes your personal data may be transferred to, and stored at, in different jurisdictions, where the personal data Protection Laws and practices are likely to be different and may be less stringent than those within the jurisdiction in which you are resident. In such cases, we will ensure that there are adequate contractual and technical measures to ensure that your personal data is processed strictly on a need-to-know basis for the purposes mentioned above and that an appropriate level of protection is given to the personal data.

5.5 Safeguarding Personal Data

No data transmission over the Internet, a website, mobile application or via email or other message service can be guaranteed to be secure from intrusion. However, we maintain commercially appropriate physical, electronic and procedural safeguards to protect your personal data in accordance with the requirements of applicable Personal Data Protection Laws.

We value the privacy of your personal data. All personal data we collect about you is stored on our or our subcontractors' secure servers. We comply with our security policies and standards when accessing or using this information and we restrict access to your personal data to those persons who need to use it for the purpose(s) for which it was collected.

5.6 Your rights

You have the right (subject to various exceptions and in accordance with applicable Personal Data Protection Laws in your country) to access, correct or delete your personal data by contacting our Data Protection Officer at DataProtection@swirebulk.com. Any

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request to exercise these rights will be assessed by us on a case-by-case basis. We may charge a reasonable fee for the processing of any data access request in accordance with applicable Personal Data Protection Laws in your country.

You also have the right to lodge a complaint about our processing with the applicable Data Protection Authority

5.7 Automated processing

We do not carry out automated decision-making or profiling in relation to your personal data.

5.8 Retention Period

We keep records of your personal data for no longer than is necessary for the purpose for which we obtained them in accordance with our internal retention policies and procedures or as otherwise permitted by applicable law or to defend ourselves if we consider a complaint or dispute to be likely or until the position is filled

If your application is unsuccessful, we may retain and use the information which you had provided for one (1) year from the date the job position that you had applied had been filled, this is to deal with any matter which may arise in connection with your application and for purposes of contacting you in connection with ongoing recruitment opportunities. If you do not wish to be considered for positions with us other than that you have applied for, please state in your cover letter the following: ***I do not wish to be considered for positions other than that I have applied.***

If you are successful in your application, the information will be used in the administration of your employment.

6. Governance

The Company reserves the right to amend this policy at its sole discretion.

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7. Policy History

Amendment Date	Section	Revision Number	Description
11-07-2025	All	3	<ul style="list-style-type: none"> • Section 5.1 Adding paragraph for applicants to keep their information provided to the Company up to date. • Section 5.2: <ul style="list-style-type: none"> ○ Personal Data held by the Company is strictly confidential. ○ Social Network Sites on removal of search of content made on public domains by job applicants.
17-10-2022	Section 2, 5.1, 5.4, 5.5 and 5.8	2	<ul style="list-style-type: none"> • Section 2 to include Company's commitment to safeguard job applicant's personal data. • Section 5.1 expanded on types of personal data collected, included under 'Legal Grounds' on consent, added right to withdraw consent. • Section 5.4 included other allowed exceptions for disclosure of personal data • Section 5.5 to inform job applicant on actions taken by the Company, clarifications on handling of unsuccessful job applications • Separated Section 5.8 Retention Period for clarify
08-02-2022	All	1	<ul style="list-style-type: none"> • Initial Issue

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