

Candidate Privacy Notice

Please note that any personal information which is provided by you or on your behalf to The Northern Trust Company or any of its affiliated entities or subsidiaries (the "Company") in connection with your application to the Company for employment will be processed in accordance with the terms of this privacy notice and applicable privacy legislation ("the Acts"). Personal information is information about an identifiable individual, as more particularly described under applicable privacy legislation.

Personal Information We Collect

The Company and its agents and representatives collect personal information in a number of circumstances in the course of accepting applications for employment and evaluating potential candidates. Personal information we may collect includes: name, address, telephone number and other contact information; educational or other credentials, employment history and experience, volunteer work, biometric information, geolocation, social security number and driver license and other information necessary to evaluate a candidate's suitability for employment; together with any other information we may collect with your consent or as required by applicable law.

Use of Personal Information and Legal Basis

The Company will use personal information for the purposes of deciding whether to offer you employment with the Company. The Company may also use personal information for the purposes of statistical analysis. If you are offered employment with the Company then the Company will use your personal information and any further information you may provide in connection with that offer and (if applicable) your subsequent employment for the purposes of establishing and maintaining an employment relationship with you, including for personnel administration, payroll and management purposes. [If you are unsuccessful in your application for employment with the Company, the Company may keep your personal information on file for a reasonable period in order to evaluate your suitability for future employment opportunities. However, in those circumstances, the Company will remove your personal information from its systems if you request it to do so. The Company may also use personal information to notify you of any changes to the website, this privacy notice or any other policies or agreements relevant to site users and for other purposes, either with your consent or as required by law.

Where the Acts require the Company to process your personal data on the basis of a specific lawful justification, we generally process your personal data under one of the following bases:

- compliance with a legal obligation to which the Company is subject;
- entering into or performance of your application and contract with the Company;
- your consent; or\
- for the Company's legitimate interests being those purposes described in the section above headed "purposes for which data is to be held or processed". We may on occasion process your personal data for the purpose of the legitimate interests of a third party where this is not overridden by your interests.

Disclosure of Your Personal Information

Service Providers and Affiliates: The Company may transfer personal information to outside agents or service providers (including affiliates of the Company acting in this capacity) who perform services on our behalf. Our service providers and affiliates may collect, use, disclose, store or process personal information on our behalf for the purposes described in this privacy notice, including storage of personal information on a central database accessible to human resources personnel within the Company.

International Processing: Some of our service providers or affiliates may be located in jurisdictions different from where you reside. Some of those jurisdictions may have data protection laws that do not offer the same degree of legal protection as those of the country where you reside.

The Company maintains a global operating model which enables delivery of our services and products to our international client base. The disclosure of personal data to third parties, including Northern Trust affiliates, set out above may therefore involve the transfer of your personal data to the USA, India, the Philippines and other countries or territories outside your country of residence. Such transfers are made in accordance with locally applicable data protection laws.

Some of the countries to which Northern Trust transfers personal data to are deemed under locally applicable data protection law, to provide an adequate level of data protection. However, you should be aware that data protection laws in other countries to which the Company transfers personal data may be considered less protective than those in your country of residence.

Where we are required to do so under applicable data protection laws, we take appropriate steps to implement appropriate technical and organisational safeguards to ensure your data continues to be adequately protected and your privacy rights respected.

We also assess the overall level of protection offered in the context of specific transfers and, where necessary, our use of appropriate safeguards is supplemented by additional measures that support an adequate level of data protection, where required under applicable data protection laws. We apply these safeguards to transfers of personal data to third parties as well as to the Northern Trust affiliates.

In limited circumstances and where permitted under applicable data protection laws, the Company may rely on a derogation from the obligation to ensure an adequate level of protection, meaning that we transfer personal data without the use of appropriate safeguards. This may be the case where, for example, a transfer of your personal data is necessary for important reasons of public interest, or to establish, exercise or defend legal claims.

Please contact Privacy_Compliance@ntns.com for copies of appropriate safeguards. Please be aware that appropriate safeguards may be redacted for reasons of commercial confidentiality.

Business Transactions: The Company may disclose personal information to successors of the Company, who may use and disclose personal information for those purposes described in this privacy notice.

Legal, Regulatory: The Company may disclose your personal information as necessary to meet legal, regulatory, insurance, audit and security requirements and otherwise with your consent or as required by applicable law, rule, regulation, or valid legal process.

Your Consent

How Consent Is Provided: You may provide us with your consent to the collection, use and disclosure of personal information in various ways such as by submitting your consent via the online application form when applying for a role with Northern Trust. Consent can be express (for example, by submitting an online employment application that contains a consent provision). You may provide your consent by creating an account in our online candidate application form for the collection, use, and disclosure of personal information.

Consent For Disclosed Purposes: Generally, by completing the online candidate application form and providing us with personal information, you will be asked to consent to our collection, use and disclosure of such information for the purposes identified or described in this privacy notice, if applicable, or otherwise at the time of collection.

Third Party Consents: Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). If you provide us with personal information about a third party such as a reference we will assume that you have the consent of that third party to provide their personal information to us.

Withdrawal of Consent: You may withdraw your consent to our collection, use and disclosure of personal information at any time, [subject to contractual and legal restrictions and reasonable notice, where permitted under applicable data protection laws. If you withdraw your consent to certain uses of your personal information, we may no longer be able to continue our relationship with you.

Security

Security Measures: The Company will take reasonable steps to protect your personal information against loss, theft or misuse as well as unauthorized access, disclosure, copying, use, modification, alteration or destruction, which steps may include technical, contractual, administrative, and physical steps that are appropriate to the sensitivity of the information.

Insecure Transmissions: Please note that the Company cannot guarantee the security of any communication or material transmitted to/from the Company via the Internet, whether through the site or by email. Therefore, please do not send any sensitive personal information using these methods.

Local Laws: The reasonable contractual and other measures we take to protect your personal information while processed or handled by service providers and affiliates may be subject to legal requirements of the applicable countries where processing or handling takes place, for example, lawful requirements to disclose personal information to government authorities in those countries.

Your Data Subject Rights and Contacting Us

The Company may establish and maintain a file of your personal information for the purposes described above. You have the following rights in certain circumstances as permitted under applicable laws and subject to certain exception, in relation to your personal information based on your country of residence:

- (i) Right of access (Subject Access Requests) – In certain circumstances, you have the right to request personal information that the Company hold and to be informed about how we obtained and use your personal information.
- (ii) Right of rectification – In certain circumstances, you have the right to request that the Company rectify inaccurate personal information.
- (iii) Right of erasure (right to be forgotten) – In certain circumstances you have the right to request that the Company erase personal information
- (iv) Right to restrict processing – In certain circumstances you have the right to request that the Company restrict the use of personal information (e.g. if the individual believes it to be inaccurate).
- (v) Right to data portability – In certain circumstances you have the right to request that the Company provide your personal information to you or another controller in a structured, commonly used, machine-readable format.
- (vi) Right to object – In certain circumstances you have the right to object to certain processing of personal information (unless the Company has overriding compelling grounds to continue processing) and the right to object to direct marketing.
- (vii) Rights relating to automated decision making – In certain circumstances you have the right to object/opt-out of automated decision making that significantly affects the individual (e.g. certain profiling).
- (viii) Right to opt-out of selling personal information – In certain circumstances you have the right to opt out for the sale of your personal information.

If you wish to make inquiries or complaints or have other concerns about our personal information practices, you may contact us as below;

Region	Email	Telephone
North America	Privacy_Compliance@ntrs.com	+1 312-557-7593; toll free from within USA: 800-807-0302
Asia Pacific (APAC, ex-India)	Privacy_Compliance@ntrs.com	+1 630-276-5353
India	Grievance Officer : Privacy_Compliance@ntrs.com	toll free from within India: 1800-532-0333
Europe, Middle East and Africa (EMEA)	Privacy_Compliance@ntrs.com	+44 (0) 207 982 4357, option 4

Privacy Notice Changes

The practices outlined above represent our current policies with respect to the handling of personal information. We may review and revise this privacy notice from time to time without notice. Your continued provision of personal information or use of this site following any changes this privacy notice constitutes your acceptance of any such changes. You should review this privacy notice often to ensure familiarity with its then-current terms and conditions. We will obtain explicit consent from you for changes to this privacy notice, where required under applicable data protection laws.

Acknowledgement and Consent

For candidates applying for a position in India, by submitting your application, you acknowledge and agree that you have read and understood this Candidate Privacy Notice, and hereby expressly authorize and consent to all collection, use, holding, disclosure, transfer, and other processing of my personal information as described in this Candidate Privacy Notice, and you agree to comply with this Candidate Privacy Notice at all times. You also agree to the collection, use, disclosure and other processing of certain sensitive personal information, which may include Aadhar number, PAN number and UAN details by the Company as described in this Candidate Privacy Notice.