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Gallagher – Global Applicant Privacy Notice

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Introduction

This Global Applicant Privacy Notice (“Privacy Notice”) describes the handling of personal information obtained from applicants or prospective applicants for employment. This Privacy Notice applies to personal information submitted directly by you (“you” or “your”), as well as by third-party agencies and recruiters on your behalf. Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identifiable or identified.

This Privacy Notice describes the practices of Gallagher, the company to which you are applying for a job opportunity (as identified in the applicable advertisement), and any subsidiaries, affiliates, and related companies (which are referred to simply as “Gallagher”, “we”, “us” or “our” in this Privacy Notice).

Principles

I. Principle of collection limitation



Data controllers shall set limits for the collection of personal information and comply with legal and fair means for its collection, whenever appropriate, with the knowledge or consent of the data subject concerned.

II. Principle of data quality

Personal information shall be relevant to the purpose of its use and, to the extent necessary for that purpose, accurate, complete, and current.

III. Principle of purpose specification

The purpose of data collection shall be specified at the latest at the time of collection and its use shall be limited to the fulfillment of the purposes or other purposes that are not incompatible with the original purpose, specifying the change of purpose from time to time.

IV. Principle of use limitation

Personal information shall not be disclosed, made available, or used for purposes that are not outlined in this Privacy Notice, unless the following requirements are met:

- With the consent of the data subject, or
- If required by law or by the authorities.

V. Principle of safeguarding the security

Reasonable security safeguards will be employed to protect personal information against risks, such as loss, unauthorized access, destruction, use, modification, or disclosure.

The above principles will guide the collection, processing, and authorization of the processing of personal information.

Collecting your information

Information we collect directly from you

In the course of your application being submitted, Gallagher will receive and hold your personal information, which may include 'sensitive' personal information depending on the nature of your application, such as:

- I. Personal details, such as name, title, marital status, gender, date and place of birth, age, language(s) spoken and nationality.
- II. Contact information, such as your postal address, email address, or phone/mobile number.
- III. Information contained in your resume or CV, LinkedIn profile, online employment profile, and other documents related to the application or hiring process, such as a cover letter, references,



licensing information, certifications, and similar items.

- IV. Information about your authorization to work in the relevant jurisdiction, such as passports, visa-related documents, details of residency and national identification documents.
- V. Demographic information including your age and gender, and where applicable and in accordance with the law, your race, ethnicity, religious or philosophical beliefs, political opinions, membership of professional or trade associations, disclosed gender identity or sexual orientation and disability status.
- VI. Details regarding any criminal history, in accordance with applicable laws in force in the relevant jurisdiction.
- VII. Information required for or obtained from specific aptitude, personality, or skills assessments.
- VIII. Any other information you choose to provide to Gallagher in connection with your application.

Information we may collect from other sources

- I. Background check information from available screening agencies, recruitment agencies, or public records as permitted by local law, e.g., address history, work experience or employment history, national identification number, identity card number or another national identifier, date of birth, and sex.
- II. Criminal and credit history, education, employment verification, references, address searches, public safety verification, and professional certifications.
- III. Publicly accessible, members-only professional profiles available on websites or social networking sites (e.g., LinkedIn).
- IV. Educational, licensing, and professional agency training records.

On certain occasions, Gallagher may be required by law to collect certain personal information about you as a consequence of (or to enter into) any contractual relationship Gallagher has with you. Failure to provide this information may prevent or delay the performance of these obligations. Gallagher will inform you at the time of collecting your information whether certain information is mandatory and the consequences of failure to provide such information.

Using your information

Gallagher will use the information you have provided for the following purposes:

- Consider your general and specific suitability for one or more open vacancies within Gallagher, including assessing your aptitude and skill set.
- Verify the information you have provided, including conducting the screening.



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- Arrange interviews or aptitude tests.
- Make an offer of employment.
- Contact you to obtain detailed information about future roles and positions that may be of interest to you.
- Comply with obligations imposed by laws and regulations for which Gallagher is responsible.
- Conduct general statistical analysis and reporting, including applicant activity, demographic reporting and de-identifying or aggregating for further processing.
- Internal purposes to improve and develop our processes and systems, including developing systems and algorithms involving machine learning and artificial intelligence.
- Any other requirements arising from the prospective employment, business, or social relationship between you and Gallagher.

If you become an employee of Gallagher, any personal information you submit through the application process will be used in connection with your employment as set out in your employment contract, internal policies, and procedures, and as permitted by applicable laws.

In most cases, our objective in processing your personal information will be:

- To comply with Gallagher's legal obligations, for example, obtaining evidence of your identity to enable us to comply with our anti-money laundering obligations, or obtaining evidence of your employment status to enable us to comply with relevant obligations.
- To comply with Gallagher's legal obligations to you (including, for example, health and safety or anti-discrimination obligations that Gallagher must comply with), or to a third party (including tax authorities, health insurance providers, social security agencies, or other government authorities).
- To meet Gallagher's legitimate operational needs and interests, for example, to effectively manage prospective employees and protect the company against theft or other crimes. Whenever Gallagher processes personal information, Gallagher implements reasonable security measures to ensure that your privacy is protected and that legitimate business operational interests are protected.
- Gallagher may obtain your consent to collect and use certain types of personal information, where permitted by law in each jurisdiction, to conduct direct marketing activities, cookies, and tracking technologies, and to process sensitive personal information.
- If Gallagher requests your consent to process your personal information, you may withdraw your consent at any time after giving it by contacting us using the details at the end of this Privacy Notice.



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Automated decisions, machine learning and AI

At Gallagher we are dedicated to providing an efficient recruitment experience. As part of our commitment to embracing innovative technologies, some Gallagher entities may employ automated applications, including machine learning and artificial intelligence (AI), to aid in the recruitment process. We believe that automated applications and AI can help us deliver a more personalized and efficient experience for our applicants, including profiling applicants and matching them to open vacancies, guiding the completion of application forms, answering frequently asked questions, pre-screening applications, scheduling interviews and keeping applicants informed and engaged throughout the interview process.

Where required by local law, we will undertake a bias audit to ensure there is no bias in an AI application. After conducting that audit, we will make those results public.

These applications may process and evaluate your personal information to make decisions and create profiles about you to determine your suitability and eligibility for general or specific employment at Gallagher.

Gallagher will only use these automated applications to make decisions about you in cases where:

- The description of certain skills of the applicant are necessary to enter into a contract (for example, Gallagher may decide not to proceed with your application or offer you a job based on information that demonstrates ineligibility for employment);
- Such decisions are required or authorized by law (for example, for fraud prevention purposes); or
- You give your consent for Gallagher to use automated applications to make decisions about you.

Subject to local legal requirements and limitations, you may contact Gallagher to request more information about our use of automated applications to make decisions, object to the use of such automated applications, or request that a decision resulting from an automated application be reviewed by a human being.

Sharing your information

The Gallagher company to which you are applying for a job opportunity, as identified in the relevant advertisement, and Arthur J. Gallagher & Co. are the "controllers" responsible for the personal information collected and processed about you.

Gallagher may share your personal information with carefully selected third parties who provide various services to Gallagher, and who have entered into agreements with Gallagher for the protection and non-disclosure of the personal information and data they receive from us, among them:



- Providing background checks, including credit or criminal check verification services and medical examinations (to the extent such checks are permitted by applicable law).
- Recruitment and selection.
- Professional, elective and mandatory training.
- IT services such as website management, data analysis, and data backup.
- Security and storage services.

When this occurs, Gallagher takes reasonable and appropriate technical, administrative and physical measures to keep your personal information secure. Where necessary, your personal information may also be disclosed to law enforcement, regulatory, or other government agencies, or third parties to comply with legal or regulatory obligations or requests. To the extent permitted by law, Gallagher disclaims any liability arising from the use of your personal information by third parties. In all cases, data transfers will be recorded and documented, identifying the recipient of the data, the purpose of the transmission, and the type of data that was transmitted. Where permitted by law, Gallagher may, upon request, confirm the name of each third party to whom personal information is or will be transferred.

Gallagher is part of a global group of companies and, for recruitment and employment purposes, may use resources and servers located in various countries around the world to access, store or process your personal information, including outside the jurisdiction in which you reside. Please see the section on international data transfer below for more information.

Storing your information

Gallagher will store your personal information in accordance with its statutory obligations and internal policies and procedures.

Gallagher will retain your personal information for as long as required by law and necessary for employment administration purposes. If your employment application is unsuccessful, Gallagher may retain your personal information for a reasonable period with respect to Gallagher's legitimate business purposes and potentially contact you about other relevant employment opportunities. If you have applied through our "Careers site/ vacancy application website", we will generally delete your information two years after your last contact with us. Please let us know during the application process or by using the contact details below if you do not want us to store your personal information to receive notifications about future employment opportunities. When required by law, we will only retain your personal information to notify you of other employment opportunities when you have given consent.



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International data transfer

Due to the global nature of Gallagher Group operations, we will transfer certain personal information across geographical borders to our Gallagher Group companies or service providers (working in conjunction with us or on our behalf) to fulfil the purposes described in this Privacy Notice.

This means that your personal information may be transferred to, stored, and processed outside your local jurisdiction. The laws that apply to the country where the data is transferred may not be equivalent to that in your local country (or in the country in which we provide the services). Transfers of personal information will be subject to reasonable and appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal information is adequately protected. For more information on the appropriate safeguards in place, please contact us using the details in the “Contact us” section.

Your rights and responsibilities

You are responsible for ensuring that the personal information you submit is accurate and up to date, as any incorrect information may invalidate your application and, if applicable, any offer of employment.

Based on the country in which you reside, and subject to permitted exemptions, you may have certain rights in relation to your personal information. These rights may include:

- Access your personal information.
- Request proof of prior authorization or consent given to us to collect and process personal information.
- Correct errors in the information Gallagher holds about you.
- Erase your personal information.
- Restrict Gallagher's use or disclosure of your personal information.
- Object to our use or disclosure of your personal information.
- File requests, complaints, or grievances about Gallagher's use of your personal information.
- Request details on our use and processing of your personal information.
- Receive your personal information in a usable electronic format and transmit it to a third party (right to data portability).
- Revoke your consent (where applicable) to the processing of your personal information at any time.

You can exercise your rights by contacting us using the details provided in the “Contact us” section below. We will usually not charge you for processing these requests. There may be cases where we are unable to comply with your request (e.g., via a permitted exemption or where the request would conflict with our obligation to comply with other legal requirements). We will tell you the reason if we cannot comply with your request and we will always respond to any request you make.

If you believe that you have rights under applicable law or would like to understand what rights you have, please contact us using the details provided in the “Contact us” section below.

Contact us

If you have questions or concerns about how your personal information has been collected, stored, used, or disclosed, please contact us at: GallagherHRCompliance@ajg.com or contact the person you have been in contact with regarding your employment application.

You can also contact our data protection officer at: GlobalPrivacyOffice@ajg.com.

In some jurisdictions, there is a legal requirement to provide the name of the individual responsible for data protection.

| Country | Role and name |
|--------------|---|
| Bermuda | Privacy Officer: Silvanos Inyangala (Artex) Privacy Officer: Antonia Holder (Gallagher Re) |
| Brazil | Data Protection Officer: Camila Bernardo |
| Colombia | Data Protection Officer : Fabian Moreno Barbosa |
| India | Grievance Officer: Sridevi Bangera |
| Malaysia | Data Privacy Lead, Data Protection Office |
| South Africa | Data Protection Officer: Amanda Lightfoot |

We are committed to working with you to obtain an appropriate and fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to make a complaint to the data protection authority in your country of residence. Please contact us if you require the contact details of the applicable data protection authority.

Changes to this Privacy Notice

This Privacy Notice may be updated periodically to reflect changes in Gallagher's personal information practices or applicable laws. The current version is available on Gallagher's website at www.ajg.com/applicant-privacy. Where changes to this Privacy Notice will have a fundamental impact on the nature of the processing or will have a material impact on you, Gallagher will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g., object to those changes).

Effective Date: September 10, 2024



UNITED STATES OF AMERICA: STATE OF CALIFORNIA ADDENDUM TO THE GALLAGHER GLOBAL APPLICANT PRIVACY NOTICE

This United States of America: State of California Addendum (the “Addendum”) supplements the terms of Gallagher’s Global Applicant Privacy Notice (“Privacy Notice”).

I. CALIFORNIA PRIVACY POLICY

The Addendum applies only to individuals who apply for employment with Gallagher and are residents of the State of California. For purposes of this Addendum, “you” means residents of the State of California.

This Addendum will provide you with information about our Information Practices and your privacy rights under the California Consumer Privacy Act (CCPA), the California Privacy Rights Act (CPRA) and applicable regulations (collectively referred to as “CCPA”). Any terms defined in the CCPA have the same meaning when used in this Addendum.

1) Personal Information we collect

Gallagher collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household (“CCPA Covered Personal Information” or “personal information”). CCPA Covered Personal Information does not include personal information that has been de-identified or aggregated, or that is publicly available information from government records.

In particular, and in addition to the personal information described in the [Collecting your information](#) section of the Privacy Notice, we have collected the following categories of CCPA Covered Personal Information from consumers (as that term is defined in the CCPA) within the last twelve (12) months:

| Category | Examples | Collected |
|---|--|-----------|
| A. Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers. | Yes |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, medical information, or health insurance information. Some personal information included | Yes |



| Category | Examples | Collected |
|---|---|-----------|
| | in this category may overlap with other categories. | |
| C. Protected classification characteristics under California or federal law. | Age (40 years or older), race, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status. | Yes |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | No |
| E. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | No |
| F. Internet or other similar network activity. | Browsing history, search history, information on a your interaction with a Site, application, or advertisement. | Yes |
| G. Geolocation data. | Physical location or movements. | No |
| H. Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | Yes |
| I. Professional or employment related information | Occupation, title, employer information, current or past job history or performance evaluations, LinkedIn profile, compensation and benefits information, documents related to the application or hiring process (such as a CV, cover letter, references, interview notes, licensing information, qualifications, certifications, and similar items), information relating to your authorization to work in the relevant jurisdiction, memberships in trade or professional organizations, outside directorships and external business interests, training information. | Yes |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. | No |



| Category | Examples | Collected |
|--|---|-----------|
| J. Inferences drawn from other personal information. | Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | No |
| L. Sensitive Personal Information | Social security, driver’s license, state identification or passport numbers; account log-in, financial account, debit or credit card number in combination with any required security or access code, password or credentials allowing access to an account; precise geolocation data; racial or ethnic origin, religious or philosophical beliefs or union membership, content of mail, email and text messages unless business is the intended recipient; genetic data; processing of biometric information for the purposes of uniquely identifying a consumer; personal information collected and analysed concerning your health, and criminal background check information. | Yes |

2) Categories of sources from which we collect personal information

You have the right to know the categories of sources from which we collect your personal information. We make this information available to you in the [Collecting your information](#) section of our Privacy Notice.

3) Our processing of your personal information

You have the right to know how we process and use your personal information. We make this information available to you in the [Using your information](#) section of our Privacy Notice.

To the extent that we use or maintain de-identified information, we take reasonable measures to ensure that de-identified information cannot be associated with a natural person, we publicly commit to using and maintaining de-identified information without attempting to re-identify the information, and we contractually obligate any recipient of the de-identified information to comply with the same obligations.

4) Disclosure of Personal Information

You have the right to know if we share your personal information with any third parties and the categories of those third parties. We make this information available to you in the [Sharing your information](#) section of our Privacy Notice.

5) No Sales or Sharing of Personal Information

We do not sell personal information for monetary or other consideration, and we do not share your personal information for cross-context behavioural advertising (as that term is defined in the CCPA). We have also not sold or shared the personal information of consumers under 18 years of age.



6) Use of Sensitive Personal Information

We do not use or disclose sensitive personal information for purposes other than those specified in section 7027, subsection (m) of the CCPA regulations and we do not collect or process sensitive personal information for purposes of inferring characteristics about you.

7) Your CCPA Consumer Rights

You have the following rights:

Your right to Access

You have the right to request that we disclose the categories of personal information we collected about you, the categories of sources for the personal information we collected about you, our business or commercial purpose for collecting your personal information, the categories of third parties with whom we share your personal information; and the specific pieces of personal information we collected about you.

Your right to data portability

You have the right to obtain a copy of your personal information in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the information to a third party.

Your right to delete

You may have the right to request that we delete your personal information. This right is subject to several exceptions and we may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information and take actions reasonably anticipated within the context of our ongoing relationship with you or our client;
2. Detect bugs or errors in our Sites, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Enable solely internal uses that are reasonably aligned with expectations based on your relationship with us;
4. Comply with a legal obligation; or
5. Make other internal and lawful uses of that information as permitted by law or that are compatible with the context in which we collected it.

Your right to correct



We take reasonable steps to ensure that information we hold about you is accurate and complete. However, you have the right to request that we correct any inaccurate personal information that we have about you.

Your right to non-discrimination and no retaliation

We will not discriminate or retaliate against you for exercising any of your rights under the CCPA.

a) Exercising Your Rights

You may exercise your rights to know, delete and correct as described above by submitting a verifiable request to us by either:

- Emailing us at GlobalPrivacyOffice@ajg.com
- Completing the Privacy Rights Request form at <http://cloud.info.ajg.com/privacy-rights-request-form>
- Calling us at 1-833-208-9359

b) Verification Process

We are only required to fulfill verifiable requests. Only you, you as a parent or a legal guardian on behalf of a minor child, or your authorized agent, may make a verifiable request related to personal information.

If you submit your request through an authorized agent, we may require you to provide your agent with written permission to do so and verify your identity. We may deny any request by an agent that does not submit proof that the agent has been authorized by you to act on your behalf.

- **For requests for access to categories of personal information**, we will verify your request to a “reasonable degree of certainty.” This may include matching at least two data points that you would need to provide with data points we maintain about you and that we have determined to be reliable for the purposes of verification.
- **For requests for specific pieces of personal information (portability request)**, we will verify your request to a “reasonably high degree of certainty.” This may include matching at least three data points that you would need to provide with the data points we maintain about you and that we have determined to be reliable for the purposes of verification. We will also require you to submit a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.
- **For requests to delete**, we will verify your request to a “reasonable degree” or a “reasonably high degree of certainty” depending on the sensitivity of the personal information and the risk of harm to the consumer posed by unauthorized deletion.

We will use the personal information you provide in a request only for purposes of verifying your identity or authority to make the request.



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c) Response Timing and Format

We will respond to a verifiable request within forty-five (45) days of its receipt, and will notify you within those forty-five (45) days if we require more time to respond and the reasons for the additional time.

Any information we provide in response to a verified request to know will include information we have collected about you on or after January 1, 2022, including beyond the 12-month period preceding our receipt of the request, unless doing so proves impossible or would involve disproportionate effort, or you request data for a specific time period. (Note that the law prohibits us from disclosing at any time a consumer's Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, security questions and answers, or any unique biometric information.)

If we cannot comply with a request or a portion of the request, we will include the reasons in our response. If we deny your request on the basis that it is impossible or would involve a disproportionate effort, we will explain our reasons, such as the data is not in a searchable or readily accessible format, is maintained for only legal or compliance purposes, or is not sold or used for any commercial purpose and our inability to disclose, delete or correct it would not impact you in any material manner.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

8) CCPA exemptions

This Addendum does not apply to certain information exempt from the CCPA, including but not limited to: protected health information collected by a covered entity or business associate and governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), or personal information collected, processed, sold, or disclosed pursuant to certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) and the California Financial Information Privacy Act (FIPA).

Effective Date: January 10, 2024



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UNITED KINGDOM ADDENDUM TO THE GALLAGHER GLOBAL APPLICANT PRIVACY NOTICE

This United Kingdom Addendum (“Addendum”) supplements the terms of Gallagher’s Global Applicant Privacy Notice (“Privacy Notice”).

Your personal information rights

You have certain rights in respect of your personal information under UK data protection laws.

Right to access your personal information

You have a right to ask us for copies of your personal information and certain details of how we use it.

Right to rectification

You have a right to ask us to amend or update your personal information if you believe the personal information we hold about you is inaccurate or incomplete.

Right to erasure

You have a right to ask us to erase your personal Information in certain circumstances, such as where you withdraw consent or where the personal Information we collected is no longer necessary for the original purpose. This will be balanced against other factors. For example, we may have regulatory and/or legal obligations which limit our ability to comply with your request.

Right to restriction of processing

You have a right to restrict the processing of your personal information in certain circumstances, such as where you think we no longer need to use your personal Information or where you think that the personal information we hold about you may be inaccurate.

Right to data portability

You have a right to ask that we transfer personal Information that you have given us to another organization in certain circumstances.

Right to object to processing

You have a right to object to your personal information being processed if we process your personal information in our legitimate interest.

Right to withdraw consent

We will ask for your consent for certain uses of your personal information. Where we do this, you have the right to withdraw your consent to further use of your personal information.

Right to complain

You have the right to contact us or our data protection officer if you have any concerns with how we use your personal information and we will do our best to resolve your concerns. You also have a right to complain to the Information Commissioner’s Office (ICO) if you believe that our use of your personal information is in breach of data protection laws and/or regulations. More information can be found on



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the ICO's [website](#). Exercising this right will not affect any other legal rights or remedies you have.

Contact us

You can contact us if you have any questions about how we collect, process or use your personal information or if you wish to exercise any of your rights with respect to your personal information by email us at GlobalPrivacyOffice@ajg.com.

Effective Date: January 10, 2024